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October 8, 2019

The Honorable Robert F. Kelly
United States District Court for the Eastern
District of Pennsylvania
James A. Byrne U.S. Courthouse
Room 11613
601 Market Street
Philadelphia, PA 19106

***Re: No. 17-cv-495
Eddystone Rail Co. LLC v. Bridger Logistics, LLC et al.***

Dear Judge Kelly,

On behalf of Eddystone Rail Company, LLC, we write respectfully to seek the Court's assistance in resolving significant problems we have encountered in obtaining document production from the BL/FG Defendants under this Court's June 28, 2019 Order (Doc. 333). The BL/FG Defendants now seek to engraft improper limitations on the Court's Order. As explained below, Defendants have refused to produce to Eddystone about 181 of the communications submitted to the Court *in camera*, many of which appear from their "re" lines to be central to the issues in this case. And Defendants propose to limit future productions of documents withheld on grounds of privilege. We ask the Court to make clear that such limitations—which are nowhere to be found in the Order—do not exist.

First, the BL/FG Defendants have refused to turn over all of the *in camera* documents. They continue to withhold about 181 communications from the *in camera* production. Several of the 181 communications have one or more attachments that have also been withheld. A complete listing of the 181 withheld *in camera* communications is shown in the attached spreadsheet. (Ex. A.)

Before submitting this letter to the Court, we made two separate requests that the BL/FG Defendants produce all of the *in camera* documents to us. *See* Ex. B & D. We also provided them with a list of privilege log entries that, from the log descriptions and other factors, appeared to fall within the Court's June 28 Order. (Ex. B, at 2.) In response to our first request, the BL/FG Defendants produced some of the *in camera* documents, but announced that 181 of the communications are being withheld because, in their view, these documents fall outside the

scope of the Court's June 28 Order. (Ex. C, at 1-2.) Specifically, the BL/FG Defendants asserted that, in their subjective view, the Court's June 28 Order directs them to produce documents in four subject matter areas and that “[s]ome of the documents in the *in camera* review sample do not fall within these categories.” (Ex. C, at 2.) In our second request, we pointed out that the *in camera* documents were carefully crafted by this Court to be samples of documents falling within those categories. (Ex. D, at 2.) Because the *in camera* documents were a sampling of documents in the four categories, they necessarily fall within the scope of the June 28 Order. (*Id.*) But the BL/FG Defendants refuse to produce remaining 181 of the *in camera* documents, having determined, *in their judgment*, that they are outside the scope and therefore are not “responsive documents.” (Ex. E.)

It is implausible that the 181 documents are not responsive to the June 28 Order. After all, 18 of the 181 withheld documents have the subject line “Eddystone Restructuring.” (Ex. A.) Another 13 of them have the subject line “Revised Bridger Contract” and 11 have the subject line “BTS.” (Ex. A.) The chart below shows the subject lines of the 181 withheld documents, confirming that they were all were part of the Court’s “judicially crafted” formula for capturing samples of documents within the four categories of communications.

Subject Line	# of withheld <i>in camera</i> documents
Eddystone Restructuring	18
Revised Bridger Contract	13
BTS	11
Jamex-Bridger –Revised Draft PSA	7
Bridger/Jamex/Monroe Documents	2
January Bakken Buy/Sell	18
ERC Amendment	16
Rail Logistics Agreement	14
Bridger Rail Loading Agreement (Sept 2015)	16
Amendment to COS and TLA	1
Debt Matters & BTS Subsidiary Sale	16
Contracts that need to be signed before Jan	39
BTS Banking Information	8
BTS Sale and Credit Arrangement Considerations	2
	181

Second, in addition to refusing to produce all of the *in camera* documents, the BL/FG Defendants have unilaterally imposed temporal limitations on this Court's June 28 Order. Specifically, they recently advised us: “We intend to produce documents listed on our privilege log during the Relevant Period (as defined below) that fall into the categories identified in the

June 28 Order.” Ex. C at 2. They then define the Relevant Period as two distinct time periods: “(1) May to July 2015 and (2) December 2015 to February 2016 (the “Relevant Period”)” (Ex. C at 2.)

We promptly objected, pointing out that our motion to compel sought documents from “April 1, 2015 – May 31, 2016.” (Ex. D.) It is clear that Eddystone never agreed that the BL/FG Defendants would be required to only produce documents falling in what they now describe as the “Relevant Period.”¹ More importantly, this Court’s June 28 Order lists broad categories of communications that the BL/FG Defendants are required to produce, *with no temporal limitation*. (*Id.*) The “Relevant Period” being added by the BL/FG Defendants is not a term in the Court’s June 28 Order.

Despite this, the BL/FG Defendants have made only a nebulous commitment to us. They reiterated their unsupported position, saying they “intend to produce all responsive documents from the Relevant Period.” (Ex. E.) They added: “Frankly, we do not think there are responsive communications outside of the Relevant Period.” (*Id.*) This is plainly wrong. In fact, the *in camera* documents included communications from November 2015 and March 2016. Because the Court’s “sampling” from the four categories of communications includes communications from November 2015 and March 2016, it is clear that there are “responsive” communications outside of the “Relevant Period.” (Ex. A.) Yet, the BL/FG defendants have *refused* to produce these *in camera* documents to us the November 2015 and March 2016 documents. The BL/FG Defendants also refused to produce an amended privilege log that would identify the basis for concluding that the withheld documents are outside of the Court’s June 28 Order.²

As this Court is aware, Eddystone’s motion to compel was filed on October 12, 2018 and has been pending for nearly a year. (Doc. 217.) The BL/FG’s recalcitrance has prevented Eddystone from moving forward with discovery and trial. The resolution of this matter should not be further delayed. The Court’s June 28 order does not impose the limitations that the BL/FG defendants seek to inject at this late stage, and their efforts to relitigate what has already been decided by the Court should be rejected. This Court should supply guidance on Defendants’ obligations under the June 28 Order while their production is ongoing.

Respectfully submitted,

/s Filiberto Agusti

cc: Henry E. Hockheimer, Jr.,
Counsel for Defendants

¹ In suggesting to the contrary, the BL/FG Defendants point to portions of our reply brief which addressed the proposed narrowing of the relevant dates on a different issue—the revision of privilege log entries. (Ex. C at 2.) The revision of the privilege log entries, however, is separate from the merits of the crime fraud motion.

² On October 1, 2019, the BL/FG Defendants stated that they “do not intend to comply with [Eddystone’s] request to provide yet another version of the privilege log” Ex. C at 2. We then asked if they were refusing to specify why certain documents were outside of the June 28 Order. The BL/FG Defendants were noncommittal in their October 7 response. *See* Ex. F, at 1.

Exhibit A

DOCUMENTS NOT PRODUCED BY DEFENDANTS DESPITE BEING NAMED IN *in camera* ORDER

FOURTH REVISED PRIVILEGE LOG OF DEFENDANTS BRIDGER LOGISTICS, LLC, FERRELLGAS PARTNERS, L.P., AND FERRELLGAS L.P. in

EDDYSTONE RAIL COMPANY, LLC v. BRIDGER LOGISTICS, LLC, et al.

(Civ. Action No. 17-CV-00495) (E.D. Pa.)

October 6, 2019

Priv Log ID	Attachment Count	Family Date	From	To	CC	Subject	Privilege Description
37618	4	11/16/2015 4:13 PM	*Knapp, Patrick <*pknapp@bridgergroup.com>	*Hampton, Trent <TrentHampton@Ferrellgas.com>;*Hampton, Trent		ERC Amendment	Attorney-client privileged communication/document providing and/or discussing legal advice
37617	0	11/16/2015 4:13 PM	*Patrick Knapp <*pknapp@bridgergroup.com>	*Hampton, Trent <TrentHampton@Ferrellgas.com>		ERC Amendment	Attorney-client privileged communication/document providing and/or discussing legal advice
37619	3	11/16/2015 4:13 PM	*Patrick Knapp <*pknapp@bridgergroup.com>	*Hampton, Trent <TrentHampton@Ferrellgas.com>		ERC Amendment	Attorney-client privileged communication/document providing and/or discussing legal advice
38531	3	12/3/2015 4:58 PM	*Hampton, Trent	Soiefer, Todd		FW: ERC Amendment	Confidential email communication providing legal advice regarding ERC draft amendment.
38534	0	12/3/2015 4:59 PM	Soiefer, Todd <ToddSoiefer@ferrellgas.com>	*Hampton, Trent <TrentHampton@Ferrellgas.com>;*Hampton, Trent		Re: ERC Amendment	Confidential email communication discussing legal advice regarding discussion of EddyStone amendment.
38535	0	12/3/2015 4:59 PM	Soiefer, Todd	*Hampton, Trent		Re: ERC Amendment	Confidential email communication discussing legal advice regarding discussion of EddyStone amendment.
38655	0	12/4/2015 2:54 PM	*Hampton, Trent	Soiefer, Todd		FW: ERC Amendment	Confidential email communication providing legal advice regarding ERC draft amendment.
38656	0	12/4/2015 2:55 PM	Soiefer, Todd <ToddSoiefer@ferrellgas.com>	*Hampton, Trent <TrentHampton@Ferrellgas.com>;*Hampton, Trent		Re: ERC Amendment	Confidential email communication discussing legal advice regarding discussing EddyStone amendment.
38657	0	12/4/2015 2:55 PM	Soiefer, Todd	*Hampton, Trent		Re: ERC Amendment	Confidential email communication discussing legal advice regarding discussing EddyStone amendment.
38658	0	12/4/2015 2:56 PM	*Hampton, Trent	Soiefer, Todd		RE: ERC Amendment	Confidential email communication providing legal advice regarding ERC draft amendment.
38659	0	12/4/2015 2:57 PM	Soiefer, Todd <ToddSoiefer@ferrellgas.com>	*Hampton, Trent <TrentHampton@Ferrellgas.com>;*Hampton, Trent		Re: ERC Amendment	Confidential email communication discussing legal advice regarding discussing EddyStone amendment.
38660	0	12/4/2015 2:57 PM	Soiefer, Todd	*Hampton, Trent		Re: ERC Amendment	Confidential email communication discussing legal advice regarding discussing EddyStone amendment.
38663	0	12/4/2015 2:58 PM	*Hampton, Trent	Soiefer, Todd		RE: ERC Amendment	Confidential email communication providing legal advice regarding ERC draft amendment.
38727	0	12/7/2015 3:08 PM	*Hampton, Trent	Soiefer, Todd		RE: ERC Amendment	Confidential email communication providing legal advice regarding ERC draft amendment.
38768	1	12/8/2015 10:46 AM	*Knapp, Patrick <*pknapp@bridgergroup.com>; *Patrick Knapp <*pknapp@bridgergroup.com>	Jeremy Gamboa <jgamboa@bridgergroup.com>;Gamboa, Jeremy	Dion Nicely <dnicely@bridgergroup.com>;Nicely, Dion	Fwd: Rail Logistics Agreement	Confidential email communication providing legal advice regarding rail logistics agreement.
38769	2	12/8/2015 10:46 AM	*Knapp, Patrick <*pknapp@bridgergroup.com>	Jeremy Gamboa <jgamboa@bridgergroup.com>;Gamboa, Jeremy	Dion Nicely <dnicely@bridgergroup.com>;Nicely, Dion	Fwd: Rail Logistics Agreement	Confidential email communication providing legal advice regarding rail logistics agreement.
38770	1	12/8/2015 10:46 AM	*Patrick Knapp <*pknapp@bridgergroup.com>	Jeremy Gamboa <jgamboa@bridgergroup.com>	Dion Nicely <dnicely@bridgergroup.com>	Fwd: Rail Logistics Agreement	Confidential email communication providing legal advice regarding rail logistics agreement.

38778	0	12/8/2015 11:01 AM	Jeremy Gamboa <jgamboa@bridgergroup.com>	*Patrick Knapp <pknapp@bridgergroup.com>	Dion Nicely <dnicely@bridgergroup.com>	Re: Rail Logistics Agreement	Confidential email communication discussing legal advice regarding railcar lease with Global Partners.
38793	1	12/8/2015 4:46 PM	*Patrick Knapp <pknapp@bridgergroup.com>	Jeremy Gamboa <jgamboa@bridgergroup.com>	Dion Nicely <dnicely@bridgergroup.com>	Fwd: Rail Logistics Agreement	Confidential email communication providing legal advice regarding rail logistics agreement.
38943	0	12/11/2015 11:09 AM	Rios, Julio <jrios@bridgergroup.com>; Julio Rios <jrios@bridgergroup.com>	*Trent Hampton <TrentHampton@Ferrellgas.com>; *Hampton, Trent	Jeremy Gamboa <jgamboa@bridgergroup.com>; Todd Soiefer <toddsowiefer@ferrellgas.com>; Gamboa, Jeremy; Soiefer, Todd; Todd Soiefer <toddsowiefer@ferrellgas.com>	Eddystone restructuring	Confidential email communication discussing legal advice regarding Eddystone restructuring and contract.
38945	0	12/11/2015 11:26 AM	*Hampton, Trent	Julio Rios <jrios@bridgergroup.com>	Jeremy Gamboa <jgamboa@bridgergroup.com>; Soiefer, Todd	RE: Eddystone restructuring	Confidential email communication providing legal advice regarding Eddystone restructuring.
38953	1	12/11/2015 11:51 AM	*Hampton, Trent	Julio Rios <jrios@bridgergroup.com>	Jeremy Gamboa <jgamboa@bridgergroup.com>; Soiefer, Todd	RE: Eddystone restructuring	Confidential email communication providing legal advice regarding 2014 guaranty from Logistics to ERC.
38955	0	12/11/2015 11:52 AM	Soiefer, Todd	*Hampton, Trent; Julio Rios <jrios@bridgergroup.com>	Jeremy Gamboa <jgamboa@bridgergroup.com>	RE: Eddystone restructuring	Confidential email communication discussing legal advice regarding Eddystone restructuring and contract.
38956	0	12/11/2015 11:56 AM	Rios, Julio <jrios@bridgergroup.com>; Julio Rios <jrios@bridgergroup.com>	Todd Soiefer <toddsowiefer@ferrellgas.com>; Soiefer, Todd	*Hampton, Trent <TrentHampton@Ferrellgas.com>; Jeremy Gamboa <jgamboa@bridgergroup.com>; *Hampton, Trent; Gamboa, Jeremy	Re: Eddystone restructuring	Confidential email communication seeking and discussing legal advice from Trent Hampton, Esq. regarding potential restructuring and Eddystone contract.
38957	0	12/11/2015 11:56 AM	Soiefer, Todd <ToddSoiefer@ferrellgas.com>	Julio Rios <jrios@bridgergroup.com>; Rios, Julio	*Hampton, Trent <TrentHampton@Ferrellgas.com>; Jeremy Gamboa <jgamboa@bridgergroup.com>; *Hampton, Trent; Gamboa, Jeremy	RE: Eddystone restructuring	Confidential email communication seeking and discussing legal advice from Trent Hampton, Esq. regarding potential restructuring and Eddystone contract.
38958	0	12/11/2015 11:56 AM	Soiefer, Todd	Julio Rios <jrios@bridgergroup.com>	*Hampton, Trent; Jeremy Gamboa <jgamboa@bridgergroup.com>	RE: Eddystone restructuring	Confidential email communication seeking and discussing legal advice from Trent Hampton, Esq. regarding potential restructuring and Eddystone contract.
38959	0	12/11/2015 12:04 PM	*Hampton, Trent	Soiefer, Todd; Julio Rios <jrios@bridgergroup.com>	Jeremy Gamboa <jgamboa@bridgergroup.com>	RE: Eddystone restructuring	Confidential email communication providing legal advice regarding Eddystone restructuring.
38960	0	12/11/2015 12:07 PM	Rios, Julio <jrios@bridgergroup.com>; Julio Rios <jrios@bridgergroup.com>	*Hampton, Trent <TrentHampton@Ferrellgas.com>; *Hampton, Trent	Todd Soiefer <toddsowiefer@ferrellgas.com>; Jeremy Gamboa <jgamboa@bridgergroup.com>; Soiefer, Todd; Gamboa, Jeremy	Re: Eddystone restructuring	Confidential email communication discussing legal advice regarding Eddystone restructuring and contract.
39010	0	12/11/2015 5:26 PM	*Hampton, Trent </O=EXCHANGELABS/OU=EXCHANGE ADMINISTRATIVE GROUP (FYDIBOHF23SPDLT)/CN=RECIPIENTS/CN=29DA8C082B9F4B7996FF297AF7B83B8F-HAMPTON, TR>	Rios, Julio <jrios@bridgergroup.com>	Gamboa, Jeremy <jgamboa@bridgergroup.com>; Soiefer, Todd <ToddSoiefer@ferrellgas.com>	RE: Eddystone restructuring	Confidential email communication providing legal advice regarding discussion of Eddystone contract terms.
39011	1	12/11/2015 5:51 PM	*Hampton, Trent </O=EXCHANGELABS/OU=EXCHANGE ADMINISTRATIVE GROUP (FYDIBOHF23SPDLT)/CN=RECIPIENTS/CN=29DA8C082B9F4B7996FF297AF7B83B8F-HAMPTON, TR>	Rios, Julio <jrios@bridgergroup.com>	Gamboa, Jeremy <jgamboa@bridgergroup.com>; Soiefer, Todd <ToddSoiefer@ferrellgas.com>	RE: Eddystone restructuring	Confidential email communication providing legal advice regarding discussion of Eddystone contract terms.

39012	0	12/11/2015 5:52 PM	Soiefer, Todd </O=EXCHANGELABS/OU=EXCH ANGE ADMINISTRATIVE GROUP (FYDIBOHF23SPDLT)/CN=RECIPIE NTS/CN=21F3FB8C71E4EF9954 30264114FBFE9-SOIEFER, TO>	*Hampton, Trent <TrentHampton@Ferrellgas.com>;Rios, Julio <jrios@bridgergroup.com>	Gamboa, Jeremy <jgamboa@bridgergroup.com>	RE: Eddystone restructuring	Confidential email communication discussing legal advice regarding discussion of Eddystone contract terms.
39013	0	12/11/2015 5:56 PM	Soiefer, Todd </O=EXCHANGELABS/OU=EXCH ANGE ADMINISTRATIVE GROUP (FYDIBOHF23SPDLT)/CN=RECIPIE NTS/CN=21F3FB8C71E4EF9954 30264114FBFE9-SOIEFER, TO>	Rios, Julio <jrios@bridgergroup.com>	Gamboa, Jeremy <jgamboa@bridgergroup.com>;*Hampton, Trent <TrentHampton@Ferrellgas.com>	RE: Eddystone restructuring	Confidential email communication seeking and discussing legal advice from Trent Hampton, Esq. regarding potential restructuring and Eddystone contract.
39014	0	12/11/2015 5:56 PM	Julio Rios <jrios@bridgergroup.com>	Soiefer, Todd <ToddSoiefer@ferrellgas.com>	Gamboa, Jeremy <jgamboa@bridgergroup.com>;*Hampton, Trent <TrentHampton@Ferrellgas.com>	Re: Eddystone restructuring	Confidential email communication seeking and discussing legal advice from Trent Hampton, Esq. regarding potential restructuring and Eddystone contract.
39015	0	12/11/2015 5:56 PM	Rios, Julio </O=EXCHANGELABS/OU=EXCH ANGE ADMINISTRATIVE GROUP (FYDIBOHF23SPDLT)/CN=RECIPIE NTS/CN=4260263CB6A74EE7AD 666CC1004181A6-JULIO RIOS>	Soiefer, Todd <ToddSoiefer@ferrellgas.com>	Gamboa, Jeremy <jgamboa@bridgergroup.com>;*Hampton, Trent <TrentHampton@Ferrellgas.com>	Re: Eddystone restructuring	Confidential email communication seeking and discussing legal advice from Trent Hampton, Esq. regarding potential restructuring and Eddystone contract.
39016	0	12/11/2015 6:04 PM	*Hampton, Trent </O=EXCHANGELABS/OU=EXCH ANGE ADMINISTRATIVE GROUP (FYDIBOHF23SPDLT)/CN=RECIPIE NTS/CN=29DA8C082B9F4B7996 FF297AF7B83B8F-HAMPTON, TR>	Rios, Julio <jrios@bridgergroup.com>;Soiefer, Todd <ToddSoiefer@ferrellgas.com>	Gamboa, Jeremy <jgamboa@bridgergroup.com>	RE: Eddystone restructuring	Confidential email communication providing legal advice regarding discussion of Eddystone contract terms.
39017	0	12/11/2015 6:07 PM	Rios, Julio </O=EXCHANGELABS/OU=EXCH ANGE ADMINISTRATIVE GROUP (FYDIBOHF23SPDLT)/CN=RECIPIE NTS/CN=4260263CB6A74EE7AD 666CC1004181A6-JULIO RIOS>	*Hampton, Trent <TrentHampton@Ferrellgas.com>	Gamboa, Jeremy <jgamboa@bridgergroup.com>;Soiefer, Todd <ToddSoiefer@ferrellgas.com>	Re: Eddystone restructuring	Confidential email communication discussing legal advice regarding discussion of Eddystone contract terms.
39018	0	12/11/2015 6:07 PM	Julio Rios <jrios@bridgergroup.com>	*Hampton, Trent <TrentHampton@Ferrellgas.com>	Gamboa, Jeremy <jgamboa@bridgergroup.com>;Soiefer, Todd <ToddSoiefer@ferrellgas.com>	Re: Eddystone restructuring	Confidential email communication discussing legal advice regarding discussion of Eddystone contract terms.
39051	1	12/14/2015 1:20 PM	Nicely, Dion <dnicely@bridgergroup.com>;Di on Nicely <dnicely@bridgergroup.com>	*Patrick Knapp <*pknapp@bridgergroup.com>;*Knapp, Patrick		FW: Bridger Rail Loading Agreement (SEPT 2015)	Confidential email communication discussing legal advice regarding Bridger rail loading agreement.
39052	0	12/14/2015 1:20 PM	Dion Nicely <dnicely@bridgergroup.com>	*Patrick Knapp <*pknapp@bridgergroup.com>		FW: Bridger Rail Loading Agreement (SEPT 2015)	Confidential email communication discussing legal advice regarding Bridger rail loading agreement.
39102	1	12/14/2015 7:20 PM	Dion Nicely <dnicely@bridgergroup.com>	*Patrick Knapp <*pknapp@bridgergroup.com>		FW: Bridger Rail Loading Agreement (SEPT 2015)	Confidential email communication discussing legal advice regarding Enbridge notification of termination of contract.
39476	3	12/18/2015 3:56 PM	*Hampton, Trent	*Goodgame, John (JGoodgame@AkinGump.com) <JGoodgame@AkinGump.com>		FW: ERC Amendment	Confidential email communication providing legal advice regarding issues from Eddystone demand letter.

39500	3	12/18/2015 9:56 PM	*Hampton, Trent <TrentHampton@Ferrellgas.com>	*Goodgame, John <jgoodgame@akingump.com>		FW: ERC Amendment	Confidential email communication providing legal advice regarding Eddystone contracts.
39765	0	12/24/2015 6:44 PM	*Hampton, Trent <TrentHampton@Ferrellgas.com>	*Goodgame, John <jgoodgame@akingump.com>		Fwd: Amendment to COSA and TLA	Confidential email communication providing legal advice regarding amendment to COSA and transportation logistics agreement.
39810	2	12/29/2015 10:21 AM	Dion Nicely <dnicely@bridgergroup.com>;Nicely, Dion <dnicely@bridgergroup.com>	*Patrick Knapp <*pknapp@bridgergroup.com>;*Knapp, Patrick	Jeremy Gamboa <jgamboa@bridgergroup.com>;Gamboa, Jeremy	FW: Revised Bridger Contract	Confidential email communication discussing legal advice regarding draft of rail shipping contract with Norfolk Southern.
39811	2	12/29/2015 10:21 AM	Dion Nicely <dnicely@bridgergroup.com>	*Patrick Knapp <*pknapp@bridgergroup.com>	Jeremy Gamboa <jgamboa@bridgergroup.com>	FW: Revised Bridger Contract	Confidential email communication discussing legal advice regarding draft of rail shipping contract with Norfolk Southern.
39815	2	12/29/2015 11:21 AM	Nicely, Dion <dnicely@bridgergroup.com>;Dion Nicely <dnicely@bridgergroup.com>	*Patrick Knapp <*pknapp@bridgergroup.com>;*Knapp, Patrick	Jeremy Gamboa <jgamboa@bridgergroup.com>;Gamboa, Jeremy	FW: Revised Bridger Contract	Confidential email communication discussing legal advice regarding draft of rail shipping contract with Norfolk Southern.
39816	0	12/29/2015 11:21 AM	Dion Nicely <dnicely@bridgergroup.com>	*Patrick Knapp <*pknapp@bridgergroup.com>	Jeremy Gamboa <jgamboa@bridgergroup.com>	FW: Revised Bridger Contract	Confidential email communication discussing legal advice regarding draft of rail shipping contract with Norfolk Southern.
39817	1	12/29/2015 1:05 PM	Nicely, Dion <dnicely@bridgergroup.com>;Dion Nicely <dnicely@bridgergroup.com>	*Patrick Knapp <*pknapp@bridgergroup.com>;*Knapp, Patrick		FW: Bridger Rail Loading Agreement (SEPT 2015)	Confidential email communication discussing legal advice regarding rail loading agreement with Enbridge for Berthold Rail Facility.
39818	0	12/29/2015 1:05 PM	Dion Nicely <dnicely@bridgergroup.com>	*Patrick Knapp <*pknapp@bridgergroup.com>		FW: Bridger Rail Loading Agreement (SEPT 2015)	Confidential email communication discussing legal advice regarding rail loading agreement with Enbridge for Berthold Rail Facility.
39834	0	12/29/2015 2:10 PM	*Knapp, Patrick <*pknapp@bridgergroup.com>; *Patrick Knapp <*pknapp@bridgergroup.com>	Dion Nicely <dnicely@bridgergroup.com>;Nicely, Dion	Jeremy Gamboa <jgamboa@bridgergroup.com>;Gamboa, Jeremy	Re: Revised Bridger Contract	Confidential email communication providing legal advice regarding discussion of a revised Bridger contract.
39835	0	12/29/2015 2:10 PM	*Patrick Knapp <*pknapp@bridgergroup.com>	Dion Nicely <dnicely@bridgergroup.com>	Jeremy Gamboa <jgamboa@bridgergroup.com>	Re: Revised Bridger Contract	Confidential email communication providing legal advice regarding discussion of a revised Bridger contract.
39836	0	12/29/2015 2:15 PM	Dion Nicely <dnicely@bridgergroup.com>;Nicely, Dion <dnicely@bridgergroup.com>	*Patrick Knapp <*pknapp@bridgergroup.com>;*Knapp, Patrick	Jeremy Gamboa <jgamboa@bridgergroup.com>;Gamboa, Jeremy	Re: Revised Bridger Contract	Confidential email communication discussing legal advice regarding draft of rail shipping contract with Norfolk Southern.
39837	0	12/29/2015 2:15 PM	Dion Nicely <dnicely@bridgergroup.com>	*Patrick Knapp <*pknapp@bridgergroup.com>	Jeremy Gamboa <jgamboa@bridgergroup.com>	Re: Revised Bridger Contract	Confidential email communication discussing legal advice regarding draft of rail shipping contract with Norfolk Southern.
39852	2	12/29/2015 5:21 PM	Dion Nicely <dnicely@bridgergroup.com>	*Patrick Knapp <*pknapp@bridgergroup.com>	Jeremy Gamboa <jgamboa@bridgergroup.com>	FW: Revised Bridger Contract	Confidential email communication discussing legal advice regarding draft of rail shipping contract with Norfolk Southern.
39853	1	12/29/2015 7:05 PM	Dion Nicely <dnicely@bridgergroup.com>	*Patrick Knapp <*pknapp@bridgergroup.com>		FW: Bridger Rail Loading Agreement (SEPT 2015)	Confidential email communication discussing legal advice regarding rail loading agreement with Enbridge for Berthold Rail Facility.
39857	0	12/29/2015 8:10 PM	*Patrick Knapp <*pknapp@bridgergroup.com>	Dion Nicely <dnicely@bridgergroup.com>	Jeremy Gamboa <jgamboa@bridgergroup.com>	Re: Revised Bridger Contract	Confidential email communication providing legal advice regarding discussion of a revised Bridger contract.

39858	0	12/29/2015 8:15 PM	Dion Nicely <dnicely@bridgergroup.com>	*Patrick Knapp <*pknapp@bridgergroup.com>	Jeremy Gamboa <jgamboa@bridgergroup.com>	Re: Revised Bridger Contract	Confidential email communication discussing legal advice regarding draft of rail shipping contract with Norfolk Southern.
39861	6	12/30/2015 10:59 AM	Nicely, Dion <dnicely@bridgergroup.com>;Dion Nicely <dnicely@bridgergroup.com>	*Patrick Knapp <*pknapp@bridgergroup.com>;*Knapp, Patrick	Jeremy Gamboa <jgamboa@bridgergroup.com>;Gamboa, Jeremy	Contracts that need to be signed before Jan	Confidential email communication discussing legal advice regarding contracts needing to be signed.
39862	2	12/30/2015 10:59 AM	Dion Nicely <dnicely@bridgergroup.com>	*Patrick Knapp <*pknapp@bridgergroup.com>	Jeremy Gamboa <jgamboa@bridgergroup.com>	Contracts that need to be signed before Jan	Confidential email communication discussing legal advice regarding contracts needing to be signed.
39863	0	12/30/2015 11:00 AM	Gamboa, Jeremy <jgamboa@bridgergroup.com>;Jeremy Gamboa <jgamboa@bridgergroup.com>	Dion Nicely <dnicely@bridgergroup.com>;Nicely, Dion	*Patrick Knapp <*pknapp@bridgergroup.com>;*Knapp, Patrick	Re: Contracts that need to be signed before Jan	Confidential email communication discussing legal advice regarding contracts needing to be signed.
39864	0	12/30/2015 11:00 AM	Jeremy Gamboa <jgamboa@bridgergroup.com>	Dion Nicely <dnicely@bridgergroup.com>	*Patrick Knapp <*pknapp@bridgergroup.com>	Re: Contracts that need to be signed before Jan	Confidential email communication discussing legal advice regarding contracts needing to be signed.
39866	0	12/30/2015 1:40 PM	Gamboa, Jeremy <jgamboa@bridgergroup.com>;Jeremy Gamboa <jgamboa@bridgergroup.com>	Dion Nicely <dnicely@bridgergroup.com>;Nicely, Dion	*Patrick Knapp <*pknapp@bridgergroup.com>;*Knapp, Patrick	Re: Contracts that need to be signed before Jan	Confidential email communication discussing legal advice regarding contracts needing to be signed.
39867	0	12/30/2015 1:40 PM	Jeremy Gamboa <jgamboa@bridgergroup.com>	Dion Nicely <dnicely@bridgergroup.com>	*Patrick Knapp <*pknapp@bridgergroup.com>	Re: Contracts that need to be signed before Jan	Confidential email communication discussing legal advice regarding contracts needing to be signed.
39868	0	12/30/2015 1:41 PM	*Knapp, Patrick <*pknapp@bridgergroup.com>;*Patrick Knapp <*pknapp@bridgergroup.com>	Jeremy Gamboa <jgamboa@bridgergroup.com>;Gamboa, Jeremy	Dion Nicely <dnicely@bridgergroup.com>;Nicely, Dion	Re: Contracts that need to be signed before Jan	Confidential email communication providing legal advice regarding signing transportation agreements.
39869	0	12/30/2015 1:41 PM	*Patrick Knapp <*pknapp@bridgergroup.com>	Jeremy Gamboa <jgamboa@bridgergroup.com>	Dion Nicely <dnicely@bridgergroup.com>	Re: Contracts that need to be signed before Jan	Confidential email communication providing legal advice regarding signing transportation agreements.
39870	0	12/30/2015 1:42 PM	Gamboa, Jeremy <jgamboa@bridgergroup.com>;Jeremy Gamboa <jgamboa@bridgergroup.com>	*Patrick Knapp <*pknapp@bridgergroup.com>;*Knapp, Patrick	Dion Nicely <dnicely@bridgergroup.com>;Nicely, Dion	Re: Contracts that need to be signed before Jan	Confidential email communication discussing legal advice regarding contracts needing to be signed.
39871	0	12/30/2015 1:42 PM	Jeremy Gamboa <jgamboa@bridgergroup.com>	*Patrick Knapp <*pknapp@bridgergroup.com>	Dion Nicely <dnicely@bridgergroup.com>	Re: Contracts that need to be signed before Jan	Confidential email communication discussing legal advice regarding contracts needing to be signed.
39882	0	12/30/2015 9:11 PM	*Knapp, Patrick <*pknapp@bridgergroup.com>	Dion Nicely <dnicely@bridgergroup.com>;Nicely, Dion		Re: Bridger Rail Loading Agreement (SEPT 2015)	Confidential email communication providing legal advice regarding Bridger rail loading agreement.
39883	0	12/30/2015 9:11 PM	*Patrick Knapp <*pknapp@bridgergroup.com>	Dion Nicely <dnicely@bridgergroup.com>		Re: Bridger Rail Loading Agreement (SEPT 2015)	Confidential email communication providing legal advice regarding Bridger rail loading agreement.
39884	0	12/30/2015 9:11 PM	*Patrick Knapp <*pknapp@bridgergroup.com>	Dion Nicely <dnicely@bridgergroup.com>		Re: Bridger Rail Loading Agreement (SEPT 2015)	Confidential email communication providing legal advice regarding loading agreement with Berthold Rail facility.
39885	0	12/30/2015 9:16 PM	Dion Nicely <dnicely@bridgergroup.com>	*Patrick Knapp <*pknapp@bridgergroup.com>	Dan Giannini <dgiannini@bridgergroup.com>	Re: Bridger Rail Loading Agreement (SEPT 2015)	Confidential email communication discussing legal advice regarding Bridger rail loading agreement September 2015.
39889	0	12/31/2015 3:11 AM	*Patrick Knapp <*pknapp@bridgergroup.com>	Dion Nicely <dnicely@bridgergroup.com>		Re: Bridger Rail Loading Agreement (SEPT 2015)	Confidential email communication providing legal advice regarding loading agreement with Berthold Rail facility.

39890	0	12/31/2015 3:16 AM	Dion Nicely <dnicely@bridgergroup.com>	*Patrick Knapp <*pknapp@bridgergroup.com>	Dan Giannini <dgiannini@bridgergroup.com>	Re: Bridger Rail Loading Agreement (SEPT 2015)	Confidential email communication discussing legal advice regarding Bridger rail loading agreement September 2015.
39893	0	12/31/2015 11:07 AM	Dion Nicely <dnicely@bridgergroup.com>; Nicely, Dion <dnicely@bridgergroup.com>	*Patrick Knapp <*pknapp@bridgergroup.com>; Knapp, Patrick	Jeremy Gamboa <jgamboa@bridgergroup.com>; Dan Giannini <dgiannini@bridgergroup.com>; Gamboa, Jeremy; Giannini, Dan	Re: Contracts that need to be signed before Jan	Confidential email communication discussing legal advice regarding contracts that need to be signed before January 2016.
39894	0	12/31/2015 11:07 AM	Dion Nicely <dnicely@bridgergroup.com>	*Patrick Knapp <*pknapp@bridgergroup.com>	Jeremy Gamboa <jgamboa@bridgergroup.com>; Dan Giannini <dgiannini@bridgergroup.com>	Re: Contracts that need to be signed before Jan	Confidential email communication discussing legal advice regarding contracts that need to be signed before January 2016.
39897	0	12/31/2015 11:49 AM	Gamboa, Jeremy <jgamboa@bridgergroup.com>; Jeremy Gamboa <jgamboa@bridgergroup.com>	Dion Nicely <dnicely@bridgergroup.com>; Nicely, Dion	*Patrick Knapp <*pknapp@bridgergroup.com>; Dan Giannini <dgiannini@bridgergroup.com>; Knapp, Patrick; Giannini, Dan	Re: Contracts that need to be signed before Jan	Confidential email communication discussing legal advice regarding contracts that need to be signed before January 2016.
39898	0	12/31/2015 11:49 AM	Jeremy Gamboa <jgamboa@bridgergroup.com>	Dion Nicely <dnicely@bridgergroup.com>	*Patrick Knapp <*pknapp@bridgergroup.com>; Dan Giannini <dgiannini@bridgergroup.com>	Re: Contracts that need to be signed before Jan	Confidential email communication discussing legal advice regarding contracts that need to be signed before January 2016.
39899	6	12/31/2015 11:55 AM	Gamboa, Jeremy <jgamboa@bridgergroup.com>; Jeremy Gamboa <jgamboa@bridgergroup.com>	TrentHampton@Ferrellgas.com; *Hampton, Trent	Dan Giannini <dgiannini@bridgergroup.com>; Dion Nicely <dnicely@bridgergroup.com>; Giannini, Dan; Nicely, Dion	Fwd: Contracts that need to be signed before Jan	Confidential email communication discussing legal advice regarding Norfolk Southern contract and Manitou Jan loading agreement.
39913	1	12/31/2015 1:10 PM	*Hampton, Trent <TrentHampton@Ferrellgas.com>	Jeremy Gamboa <jgamboa@bridgergroup.com>; Gamboa, Jeremy	Dan Giannini <dgiannini@bridgergroup.com>; Dion Nicely <dnicely@bridgergroup.com>; Giannini, Dan; Nicely, Dion	RE: Contracts that need to be signed before Jan	Confidential email communication providing legal advice regarding time sensitive contracts.
39914	1	12/31/2015 1:10 PM	*Hampton, Trent	Jeremy Gamboa <jgamboa@bridgergroup.com>	Dan Giannini <dgiannini@bridgergroup.com>; Dion Nicely <dnicely@bridgergroup.com>	RE: Contracts that need to be signed before Jan	Confidential email communication providing legal advice regarding time sensitive contracts.
39916	0	12/31/2015 1:13 PM	*Hampton, Trent	Jeremy Gamboa <jgamboa@bridgergroup.com>	Dan Giannini <dgiannini@bridgergroup.com>; Dion Nicely <dnicely@bridgergroup.com>	RE: Contracts that need to be signed before Jan	Confidential email communication providing legal advice regarding time sensitive contracts.
39917	0	12/31/2015 1:13 PM	*Hampton, Trent <TrentHampton@Ferrellgas.com>	Jeremy Gamboa <jgamboa@bridgergroup.com>; Gamboa, Jeremy	Dan Giannini <dgiannini@bridgergroup.com>; Dion Nicely <dnicely@bridgergroup.com>; Giannini, Dan; Nicely, Dion	RE: Contracts that need to be signed before Jan	Confidential email communication providing legal advice regarding draft agreement with Norfolk southern.
39919	2	12/31/2015 1:14 PM	*Hampton, Trent	*Patrick Knapp (*pknapp@bridgergroup.com) <*pknapp@bridgergroup.com>		FW: Contracts that need to be signed before Jan	Confidential email communication providing legal advice regarding contracts that need to be signed before January 2016.
39920	2	12/31/2015 1:14 PM	*Hampton, Trent <TrentHampton@Ferrellgas.com>	*Patrick Knapp (*pknapp@bridgergroup.com) <*pknapp@bridgergroup.com>; Knapp, Patrick		FW: Contracts that need to be signed before Jan	Confidential email communication providing legal advice regarding contracts that need to be signed before January 2016.
39921	2	12/31/2015 1:14 PM	*Hampton, Trent <TrentHampton@Ferrellgas.com>	*Patrick Knapp (*pknapp@bridgergroup.com) <*pknapp@bridgergroup.com>		FW: Contracts that need to be signed before Jan	Confidential email communication providing legal advice regarding contracts that need to be signed before January 2016.
39923	0	12/31/2015 1:15 PM	Jeremy Gamboa <jgamboa@bridgergroup.com>; Gamboa, Jeremy <jgamboa@bridgergroup.com>	*Hampton, Trent <TrentHampton@Ferrellgas.com>; *Hampton, Trent	Dan Giannini <dgiannini@bridgergroup.com>; Dion Nicely <dnicely@bridgergroup.com>; Giannini, Dan; Nicely, Dion	Re: Contracts that need to be signed before Jan	Confidential email communication discussing legal advice regarding Norfolk Southern contract.

39924	0	12/31/2015 1:15 PM	*Knapp, Patrick <*pknapp@bridgergroup.com>	Dion Nicely <dnicely@bridgergroup.com>;Nicely, Dion	Dan Giannini <dgiannini@bridgergroup.com>;Giannini, Dan	Re: Bridger Rail Loading Agreement (SEPT 2015)	Confidential email communication providing legal advice regarding loading agreement with Berthold Rail facility.
39925	0	12/31/2015 1:15 PM	*Patrick Knapp <*pknapp@bridgergroup.com>	Dion Nicely <dnicely@bridgergroup.com>	Dan Giannini <dgiannini@bridgergroup.com>	Re: Bridger Rail Loading Agreement (SEPT 2015)	Confidential email communication providing legal advice regarding loading agreement with Berthold Rail facility.
39927	0	12/31/2015 1:19 PM	*Patrick Knapp <*pknapp@bridgergroup.com>	Dion Nicely <dnicely@bridgergroup.com>	Dan Giannini <dgiannini@bridgergroup.com>	Re: Bridger Rail Loading Agreement (SEPT 2015)	Confidential email communication providing legal advice regarding loading agreement with Berthold Rail facility.
39928	0	12/31/2015 1:20 PM	*Knapp, Patrick <*pknapp@bridgergroup.com>	*Hampton, Trent <TrentHampton@Ferrellgas.com>;*Hampton, Trent		Re: Contracts that need to be signed before Jan	Confidential email communication providing legal advice regarding draft agreements with Norfolk Southern and Manitou Jan.
39929	0	12/31/2015 1:20 PM	*Patrick Knapp <*pknapp@bridgergroup.com>	*Hampton, Trent <TrentHampton@Ferrellgas.com>;*Hampton, Trent		Re: Contracts that need to be signed before Jan	Confidential email communication providing legal advice regarding draft agreements with Norfolk Southern and Manitou Jan.
39930	0	12/31/2015 1:20 PM	*Patrick Knapp <*pknapp@bridgergroup.com>	*Hampton, Trent <TrentHampton@Ferrellgas.com>		Re: Contracts that need to be signed before Jan	Confidential email communication providing legal advice regarding draft agreements with Norfolk Southern and Manitou Jan.
39932	0	12/31/2015 1:21 PM	*Hampton, Trent	*Patrick Knapp <*pknapp@bridgergroup.com>		RE: Contracts that need to be signed before Jan	Confidential email communication providing legal advice regarding contracts that need to be signed before January 2016.
39934	0	12/31/2015 1:21 PM	*Hampton, Trent <TrentHampton@Ferrellgas.com>;*Hampton, Trent <TrentHampton@Ferrellgas.com>	*Patrick Knapp <*pknapp@bridgergroup.com>;*Knapp, Patrick;*Patrick Knapp <*pknapp@bridgergroup.com>		RE: Contracts that need to be signed before Jan;RE: Contracts that need to be signed before Jan	Confidential email communication providing legal advice regarding contracts that need to be signed before January 2016.
39936	0	12/31/2015 1:22 PM	*Knapp, Patrick <*pknapp@bridgergroup.com>	*Hampton, Trent <TrentHampton@Ferrellgas.com>;*Hampton, Trent		Re: Contracts that need to be signed before Jan	Confidential email communication providing legal advice regarding draft agreements with Norfolk Southern and Manitou Jan.
39937	0	12/31/2015 1:22 PM	*Patrick Knapp <*pknapp@bridgergroup.com>	*Hampton, Trent <TrentHampton@Ferrellgas.com>;*Hampton, Trent		Re: Contracts that need to be signed before Jan	Confidential email communication providing legal advice regarding draft agreements with Norfolk Southern and Manitou Jan.
39938	0	12/31/2015 1:22 PM	*Patrick Knapp <*pknapp@bridgergroup.com>	*Hampton, Trent <TrentHampton@Ferrellgas.com>		Re: Contracts that need to be signed before Jan	Confidential email communication providing legal advice regarding draft agreements with Norfolk Southern and Manitou Jan.
39939	0	12/31/2015 1:23 PM	*Hampton, Trent	Jeremy Gamboa <jgamboa@bridgergroup.com>	Dan Giannini <dgiannini@bridgergroup.com>;Dion Nicely <dnicely@bridgergroup.com>	RE: Contracts that need to be signed before Jan	Confidential email communication providing legal advice regarding discussion of Norfolk Southern contract.
39940	0	12/31/2015 1:23 PM	*Hampton, Trent <TrentHampton@Ferrellgas.com>	Jeremy Gamboa <jgamboa@bridgergroup.com>;Gamboa, Jeremy	Dan Giannini <dgiannini@bridgergroup.com>;Dion Nicely <dnicely@bridgergroup.com>;Giannini, Dan;Nicely, Dion	RE: Contracts that need to be signed before Jan	Confidential email communication providing legal advice regarding discussion of Norfolk Southern contract.
39945	0	12/31/2015 1:25 PM	Jeremy Gamboa <jgamboa@bridgergroup.com>; Gamboa, Jeremy <jgamboa@bridgergroup.com>	*Hampton, Trent <TrentHampton@Ferrellgas.com>;*Hampton, Trent	Dan Giannini <dgiannini@bridgergroup.com>;Dion Nicely <dnicely@bridgergroup.com>;Giannini, Dan;Nicely, Dion	Re: Contracts that need to be signed before Jan	Confidential email communication discussing legal advice regarding Norfolk Southern contract and Manitou Jan loading agreement.

39946	2	12/31/2015 1:54 PM	*Patrick Knapp <*pknapp@bridgergroup.com>	Dion Nicely <dnicely@bridgergroup.com>	Jeremy Gamboa <jgamboa@bridgergroup.com>;*Hampton, Trent <TrentHampton@Ferrellgas.com>	Re: Revised Bridger Contract	Confidential email communication providing legal advice regarding draft transportation agreement with Norfolk Southern.
39947	22	12/31/2015 2:03 PM	*Knapp, Patrick <*pknapp@bridgergroup.com>	Jeremy Gamboa <jgamboa@bridgergroup.com>;Gamboa, Jeremy		Re: Contracts that need to be signed before Jan	Confidential email communication providing legal advice regarding multiple terminal access, terminal services, and transportation services agreements.
39948	11	12/31/2015 2:03 PM	*Patrick Knapp <*pknapp@bridgergroup.com>	Jeremy Gamboa <jgamboa@bridgergroup.com>		Re: Contracts that need to be signed before Jan	Confidential email communication providing legal advice regarding multiple terminal access, terminal services, and transportation services agreements.
39951	11	12/31/2015 2:04 PM	*Knapp, Patrick <*pknapp@bridgergroup.com>; *Patrick Knapp <*pknapp@bridgergroup.com>	Jeremy Gamboa <jgamboa@bridgergroup.com>;Gamboa, Jeremy		Re: Contracts that need to be signed before Jan	Confidential email communication providing legal advice regarding multiple terminal access, terminal services, and transportation service agreements.
39964	1	12/31/2015 2:54 PM	*Knapp, Patrick <*pknapp@bridgergroup.com>; *Patrick Knapp <*pknapp@bridgergroup.com>	Jeremy Gamboa <jgamboa@bridgergroup.com>;Gamboa, Jeremy		Re: Contracts that need to be signed before Jan	Confidential email communication providing legal advice regarding notice of change of in control of South C&C Trucking.
39965	2	12/31/2015 2:54 PM	*Knapp, Patrick <*pknapp@bridgergroup.com>	Jeremy Gamboa <jgamboa@bridgergroup.com>;Gamboa, Jeremy		Re: Contracts that need to be signed before Jan	Confidential email communication providing legal advice regarding notice of change of in control of South C&C Trucking.
39972	0	12/31/2015 7:19 PM	*Patrick Knapp <*pknapp@bridgergroup.com>	Dion Nicely <dnicely@bridgergroup.com>	Dan Giannini <dgiannini@bridgergroup.com>	Re: Bridger Rail Loading Agreement (SEPT 2015)	Confidential email communication providing legal advice regarding rail loading agreement with Berthold Rail facility.
39973	2	12/31/2015 7:54 PM	*Patrick Knapp <*pknapp@bridgergroup.com>	Dion Nicely <dnicely@bridgergroup.com>	*Hampton, Trent <TrentHampton@Ferrellgas.com>;Jeremy Gamboa <jgamboa@bridgergroup.com>	Re: Revised Bridger Contract	Confidential email communication providing legal advice regarding ancillary transportation agreement with Norfolk Southern.
39975	1	1/2/2016 9:58 AM	Dion Nicely <dnicely@bridgergroup.com>	Taylor Phifer <tphifer@bridgergroup.com>		FW: Rail Logistics Agreement	Redaction reflects attorney-client communication from Patrick Knapp for the purposes of providing legal advice regarding draft rail logistics agreement.
39976	1	1/2/2016 3:58 PM	Dion Nicely <dnicely@bridgergroup.com>	Taylor Phifer <tphifer@bridgergroup.com>		FW: Rail Logistics Agreement	Internal emails forwarding and discussing legal advice from in-house Patrick Knapp regarding Rail Logistics Agreement.
39977	0	1/2/2016 4:30 PM	Taylor Phifer <tphifer@bridgergroup.com>	Dion Nicely <dnicely@bridgergroup.com>		RE: Rail Logistics Agreement	Internal emails forwarding and discussing legal advice from in-house Patrick Knapp regarding Rail Logistics Agreement.
39978	0	1/2/2016 4:37 PM	Dion Nicely <dnicely@bridgergroup.com>	Taylor Phifer <tphifer@bridgergroup.com>		Re: Rail Logistics Agreement	Internal emails forwarding and discussing legal advice from in-house Patrick Knapp regarding Rail Logistics Agreement.
39979	0	1/2/2016 4:45 PM	Taylor Phifer <tphifer@bridgergroup.com>	Dion Nicely <dnicely@bridgergroup.com>		RE: Rail Logistics Agreement	Internal emails forwarding and discussing legal advice from in-house Patrick Knapp regarding Rail Logistics Agreement.

39980	0	1/2/2016 4:49 PM	Dion Nicely <dnicely@bridgergroup.com>	Taylor Phifer <tphifer@bridgergroup.com>		Re: Rail Logistics Agreement	Internal emails forwarding and discussing legal advice from in-house Patrick Knapp regarding Rail Logistics Agreement.
39981	0	1/2/2016 4:53 PM	Taylor Phifer <tphifer@bridgergroup.com>	Dion Nicely <dnicely@bridgergroup.com>		RE: Rail Logistics Agreement	Internal emails forwarding and discussing legal advice from in-house Patrick Knapp regarding Rail Logistics Agreement.
39982	0	1/2/2016 5:01 PM	Dion Nicely <dnicely@bridgergroup.com>	Taylor Phifer <tphifer@bridgergroup.com>		Re: Rail Logistics Agreement	Internal emails forwarding and discussing legal advice from in-house Patrick Knapp regarding Rail Logistics Agreement.
39983	0	1/2/2016 5:04 PM	Taylor Phifer <tphifer@bridgergroup.com>	Dion Nicely <dnicely@bridgergroup.com>		Re: Rail Logistics Agreement	Internal emails forwarding and discussing legal advice from in-house Patrick Knapp regarding Rail Logistics Agreement.
40072	2	1/5/2016 11:32 AM	Dan Giannini <dgiannini@bridgergroup.com>	*Patrick Knapp <*pknapp@bridgergroup.com>;**Laurel Harwood <lharwood@bridgergroup.com>;Smith, Darby <DarbySmith@ferrellgas.com>	Dion Nicely <dnicely@bridgergroup.com>	FW: January Bakken Buy/Sell	Confidential email communication discussing legal advice regarding crude oil sales and transfers.
40073	0	1/5/2016 11:32 AM	Dan Giannini <dgiannini@bridgergroup.com>	*Patrick Knapp <*pknapp@bridgergroup.com>;**Laurel Harwood <lharwood@bridgergroup.com>;Smith, Darby <DarbySmith@ferrellgas.com>	Dion Nicely <dnicely@bridgergroup.com>	FW: January Bakken Buy/Sell	Confidential email communication discussing legal advice regarding crude oil sales and transfers.
40075	0	1/5/2016 1:23 PM	*Patrick Knapp <*pknapp@bridgergroup.com>	Dan Giannini <dgiannini@bridgergroup.com>	**Laurel Harwood <lharwood@bridgergroup.com>;Smith, Darby <DarbySmith@ferrellgas.com>;Dion Nicely <dnicely@bridgergroup.com>	Re: January Bakken Buy/Sell	Confidential email communication providing legal advice regarding January Bakken Buy/Sell.
40077	0	1/5/2016 1:38 PM	Dan Giannini <dgiannini@bridgergroup.com>	*Patrick Knapp <*pknapp@bridgergroup.com>	**Laurel Harwood <lharwood@bridgergroup.com>;Smith, Darby <DarbySmith@ferrellgas.com>;Dion Nicely <dnicely@bridgergroup.com>	Re: January Bakken Buy/Sell	Confidential email communication discussing legal advice regarding crude oil sales and transfers.
40100	4	1/5/2016 3:08 PM	*Patrick Knapp <*pknapp@bridgergroup.com>;*Knapp, Patrick <*pknapp@bridgergroup.com>	Dan Giannini <dgiannini@bridgergroup.com>;Giannini, Dan	**Laurel Harwood <lharwood@bridgergroup.com>;Smith, Darby <DarbySmith@ferrellgas.com>;Dion Nicely <dnicely@bridgergroup.com>;*Harwood, Laurel;Smith, Darby;Nicely, Dion	Re: January Bakken Buy/Sell	Confidential email communication providing legal advice regarding January Bakken Buy/Sell.
40101	8	1/5/2016 3:08 PM	*Knapp, Patrick <*pknapp@bridgergroup.com>	Dan Giannini <dgiannini@bridgergroup.com>;Giannini, Dan	**Laurel Harwood <lharwood@bridgergroup.com>;Smith, Darby <DarbySmith@ferrellgas.com>;Dion Nicely <dnicely@bridgergroup.com>;*Harwood, Laurel;Smith, Darby;Nicely, Dion	Re: January Bakken Buy/Sell	Confidential email communication providing legal advice regarding January Bakken Buy/Sell.
40102	4	1/5/2016 3:08 PM	*Patrick Knapp <*pknapp@bridgergroup.com>	Dan Giannini <dgiannini@bridgergroup.com>	**Laurel Harwood <lharwood@bridgergroup.com>;Smith, Darby <DarbySmith@ferrellgas.com>;Dion Nicely <dnicely@bridgergroup.com>	Re: January Bakken Buy/Sell	Confidential email communication providing legal advice regarding January Bakken Buy/Sell.
40125	0	1/5/2016 6:38 PM	Giannini, Dan <dgiannini@bridgergroup.com>; Dan Giannini <dgiannini@bridgergroup.com>	*Patrick Knapp <*pknapp@bridgergroup.com>;*Knapp, Patrick		FW: January Bakken Buy/Sell	Confidential email communication discussing legal advice regarding crude oil sales and transfers.
40126	0	1/5/2016 6:38 PM	Dan Giannini <dgiannini@bridgergroup.com>	*Patrick Knapp <*pknapp@bridgergroup.com>		FW: January Bakken Buy/Sell	Confidential email communication discussing legal advice regarding crude oil sales and transfers.
40130	0	1/5/2016 7:32 PM	*Patrick Knapp <*pknapp@bridgergroup.com>;*Knapp, Patrick <*pknapp@bridgergroup.com>	Dan Giannini <dgiannini@bridgergroup.com>;Giannini, Dan		Re: January Bakken Buy/Sell	Confidential email communication providing legal advice regarding January Bakken Buy/Sell agreement.

40131	0	1/5/2016 7:32 PM	*Patrick Knapp <pknapp@bridgergroup.com>	Dan Giannini <dgiannini@bridgergroup.com>		Re: January Bakken Buy/Sell	Confidential email communication providing legal advice regarding January Bakken Buy/Sell agreement.
40132	0	1/5/2016 7:37 PM	Giannini, Dan <dgiannini@bridgergroup.com>; Dan Giannini <dgiannini@bridgergroup.com>	Dion Nicely <dnicely@bridgergroup.com>; Nicely, Dion		Fwd: January Bakken Buy/Sell	Redaction reflects attorney-client communications with Patrick Knapp for the purpose of obtaining and providing legal advice regarding draft Silver Red agreement.
40134	0	1/5/2016 7:41 PM	Dion Nicely <dnicely@bridgergroup.com>	Dan Giannini <dgiannini@bridgergroup.com>		Re: January Bakken Buy/Sell	Redactions reflect attorney-client communications with Patrick Knapp for the purposes of obtaining and providing legal advice regarding draft agreement with USOR.
40137	0	1/5/2016 8:21 PM	Dan Giannini <dgiannini@bridgergroup.com>; Giannini, Dan <dgiannini@bridgergroup.com>	Dion Nicely <dnicely@bridgergroup.com>; Nicely, Dion		Re: January Bakken Buy/Sell	Redaction reflects attorney-client communications with Patrick Knapp for the purpose of obtaining and providing legal advice regarding draft Silver Red agreement.
40360	0	1/7/2016 12:57 PM	*Lehman, Andy <alehman@AKINGUMP.com>	Julio Rios <jrios@bridgergroup.com>; Trent Hampton <TrentHampton@Ferrellgas.com>; *Patrick Knapp <pknapp@bridgergroup.com>; Jeremy Gamboa <jgamboa@bridgergroup.com>; Todd Soiefer <toddsowiefer@ferrellgas.com>	*Goodgame, John <JGoodgame@AkinGump.com>; *Angell, Cynthia <cangell@akingump.com>	Bridger/Jamex/Monroe Documents	Confidential email communication providing legal advice regarding drafting Bridger/Monroe/Jamex letter agreements.
40363	0	1/7/2016 1:01 PM	*Lehman, Andy <alehman@AKINGUMP.com>	Julio Rios <jrios@bridgergroup.com>	<TrentHampton@Ferrellgas.com>; *Patrick Knapp <pknapp@bridgergroup.com>; Jeremy Gamboa <jgamboa@bridgergroup.com>; Todd Soiefer <toddsowiefer@ferrellgas.com>; *Goodgame, John <JGoodgame@AkinGump.com>; *Angell, Cynthia <cangell@akingump.com>	RE: Bridger/Jamex/Monroe Documents	Confidential email communication providing legal advice regarding drafting Bridger/Monroe/Jamex letter agreements.
40531	0	1/8/2016 12:18 PM	*Hampton, Trent	*Lehman, Andy <alehman@AKINGUMP.com>; *Patrick Knapp <pknapp@bridgergroup.com>		RE: BTS Sale and Credit Arrangement Considerations	Confidential email communication providing legal advice regarding revisions to BTS sale and credit arrangement.
40533	0	1/8/2016 12:18 PM	*Hampton, Trent <TrentHampton@Ferrellgas.com>; *Hampton, Trent <TrentHampton@Ferrellgas.com>	*Lehman, Andy <alehman@AKINGUMP.com>; *Patrick Knapp <pknapp@bridgergroup.com>; *Lehman, Andy <alehman@akingump.com>		RE: BTS Sale and Credit Arrangement Considerations	Confidential email communication providing legal advice regarding revisions to BTS sale and credit arrangement.
41082	0	1/14/2016 4:25 PM	*Knapp, Patrick <pknapp@bridgergroup.com>	Taylor Phifer <tphifer@bridgergroup.com>; Dan Giannini <dgiannini@bridgergroup.com>; Phifer, Taylor; Giannini, Dan		Re: January Bakken Buy/Sell	Confidential email communication providing legal advice regarding buy/sell agreement with Bakken.
41083	0	1/14/2016 4:25 PM	*Patrick Knapp <pknapp@bridgergroup.com>	Taylor Phifer <tphifer@bridgergroup.com>; Dan Giannini <dgiannini@bridgergroup.com>		Re: January Bakken Buy/Sell	Confidential email communication providing legal advice regarding buy/sell agreement with Bakken.
41084	0	1/14/2016 4:25 PM	*Patrick Knapp <pknapp@bridgergroup.com>; *Knapp, Patrick <pknapp@bridgergroup.com>	Taylor Phifer <tphifer@bridgergroup.com>; Dan Giannini <dgiannini@bridgergroup.com>; Phifer, Taylor; Giannini, Dan		Re: January Bakken Buy/Sell	Confidential email communication providing legal advice regarding buy/sell agreement with Bakken.
41085	0	1/14/2016 4:26 PM	Taylor Phifer <tphifer@bridgergroup.com>; Phifer, Taylor <tphifer@bridgergroup.com>	*Patrick Knapp <pknapp@bridgergroup.com>; Dan Giannini <dgiannini@bridgergroup.com>; *Knapp, Patrick; Giannini, Dan		RE: January Bakken Buy/Sell	Confidential email communication discussing legal advice regarding crude oil trade agreements.

41404	0	1/20/2016 7:05 PM	*Knapp, Patrick <*pknapp@bridgergroup.com>	Hokanson, Trisha <TrishaHokanson@ferrellgas.com>;Hokanson, Trisha		BTS banking information	Confidential email communication providing legal advice regarding Bridger Transfer Services banking information.
41405	0	1/20/2016 7:05 PM	*Patrick Knapp <*pknapp@bridgergroup.com>	Trisha Hokanson <trishahokanson@ferrellgas.com>		BTS banking information	Confidential email communication providing legal advice regarding Bridger Transfer Services banking information.
41472	0	1/21/2016 8:45 AM	Hokanson, Trisha <TrishaHokanson@ferrellgas.co m>	*pknapp@bridgergroup.com;*Knapp, Patrick	Ewing, Kevin <KevinEwing@ferrellgas.com>;Cotton, Rachel <RachelCotton@ferrellgas.com>;Ewing, Kevin;Cotton, Rachel	FW: BTS banking information	Confidential email communication discussing legal advice regarding Bridger banking information.
41473	0	1/21/2016 8:45 AM	Hokanson, Trisha <TrishaHokanson@ferrellgas.co m>	*pknapp@bridgergroup.com	Ewing, Kevin <KevinEwing@ferrellgas.com>;Cotton, Rachel <RachelCotton@ferrellgas.com>	FW: BTS banking information	Confidential email communication discussing legal advice regarding Bridger banking information.
41483	1	1/21/2016 9:28 AM	Cotton, Rachel <RachelCotton@ferrellgas.com>	Hokanson, Trisha <TrishaHokanson@ferrellgas.com>;*pknapp@bridgergro up.com;Hokanson, Trisha;*Knapp, Patrick	Ewing, Kevin <KevinEwing@ferrellgas.com>;Ewing, Kevin	RE: BTS banking information	Confidential email communication discussing legal advice regarding Bridger banking information.
41484	0	1/21/2016 9:28 AM	Cotton, Rachel <RachelCotton@ferrellgas.com>	Hokanson, Trisha <TrishaHokanson@ferrellgas.com>;*pknapp@bridgergro up.com	Ewing, Kevin <KevinEwing@ferrellgas.com>	RE: BTS banking information	Confidential email communication discussing legal advice regarding Bridger banking information.
41529	0	1/21/2016 5:20 PM	*Patrick Knapp <*pknapp@bridgergroup.com>	Rachel Cotton <rachelcotton@ferrellgas.com>	Trisha Hokanson <trishahokanson@ferrellgas.com>;Ewing, Kevin <KevinEwing@ferrellgas.com>	Re: BTS banking information	Confidential email communication providing legal advice regarding Bridger Transfer Services bank account information.
41530	0	1/21/2016 5:20 PM	*Patrick Knapp <*pknapp@bridgergroup.com>	Cotton, Rachel <RachelCotton@ferrellgas.com>	Hokanson, Trisha <TrishaHokanson@ferrellgas.com>;Ewing, Kevin <KevinEwing@ferrellgas.com>	Re: BTS banking information	Confidential email communication providing legal advice regarding Bridger Transfer Services bank account information.
41730	2	1/25/2016 12:46 PM	Brunette, Jeris <Jeris.Brunette@bracewelllaw.c om>	alheitmann@Ferrellgas.com;Heitmann, Al		FW: Debt Matters & BTS Subsidiary Sale	Confidential attorney-client communication from J. Brunette to Ferrellgas employees regarding credit agreement joinders for new Bridger entities.
41895	0	1/26/2016 6:36 PM	*Lehman, Andy </O=AKINGUMP/OU=EXCHANGE ADMINISTRATIVE GROUP (FYDIBOHF23SPDLT)/CN=RECIPIE NTS/CN=ALEHMAN>	*Angell, Cynthia <cangell@akingump.com>		BTS	Confidential email communication providing legal advice regarding post-closing documentation Bridger Logistics sale to Ferrellgas.
41896	0	1/26/2016 6:36 PM	*Lehman, Andy </O=AKINGUMP/OU=EXCHANGE ADMINISTRATIVE GROUP (FYDIBOHF23SPDLT)/CN=RECIPIE NTS/CN=ALEHMAN>	*Angell, Cynthia <cangell@akingump.com>		BTS	Confidential email communication providing legal advice regarding post-closing documentation Bridger Logistics sale to Ferrellgas.
42065	0	1/28/2016 4:36 PM	Brunette, Jeris <Jeris.Brunette@bracewelllaw.c om>	*Patrick Knapp <*pknapp@bridgergroup.com>;*Knapp, Patrick	*Smith, Luke <Luke.Smith@bracewelllaw.com>	RE: Debt Matters & BTS Subsidiary Sale	Confidential email communication providing legal advice regarding BTS matters.
42071	2	1/28/2016 7:06 PM	*Knapp, Patrick <*pknapp@bridgergroup.com>	Brunette, Jeris <Jeris.Brunette@bracewelllaw.com>	*Smith, Luke <Luke.Smith@bracewelllaw.com>	Re: Debt Matters & BTS Subsidiary Sale	Confidential email communication providing legal advice regarding BTS matters.
42072	1	1/28/2016 7:06 PM	*Patrick Knapp <*pknapp@bridgergroup.com>	Brunette, Jeris <Jeris.Brunette@bracewelllaw.com>	*Smith, Luke <Luke.Smith@bracewelllaw.com>	Re: Debt Matters & BTS Subsidiary Sale	Confidential email communication providing legal advice regarding BTS matters.
42073	1	1/28/2016 7:06 PM	*Patrick Knapp <*pknapp@bridgergroup.com>	Brunette, Jeris <Jeris.Brunette@bracewelllaw.com>	*Smith, Luke <Luke.Smith@bracewelllaw.com>	Re: Debt Matters & BTS Subsidiary Sale	Confidential email communication providing legal advice regarding South C&C Trucking LLC agreement.

42641	1	2/4/2016 2:34 AM	*Angell, Cynthia </O=AKINGUMP/OU=EXCHANGE ADMINISTRATIVE GROUP (FYDIBOHF23SPDLT)/CN=RECIPIE NTS/CN=PEREZ, CYNTHIABBE> *Lehman, Andy <alehman@akingump.com>			FW: Jamex/Bridger--Revised Draft of PSA	Confidential email communication providing legal advice regarding revisions to purchase and sale agreement between Jamex Transfer Holdings and Bridger Logistics.
42642	1	2/4/2016 2:34 AM	*Angell, Cynthia </O=AKINGUMP/OU=EXCHANGE ADMINISTRATIVE GROUP (FYDIBOHF23SPDLT)/CN=RECIPIE NTS/CN=PEREZ, CYNTHIABBE> *Lehman, Andy <alehman@akingump.com>			FW: Jamex/Bridger--Revised Draft of PSA	Confidential email communication providing legal advice regarding revisions to purchase and sale agreement between Jamex Transfer Holdings and Bridger Logistics.
42652	0	2/4/2016 6:24 AM	*Lehman, Andy <alehman@AKINGUMP.com>	Julio Rios <jrios@bridgergroup.com>;Rios, Julio	Jeremy Gamboa <jgamboa@bridgergroup.com>;Todd Soifer <toddssoifer@ferrellgas.com>;*Hampton, Trent <TrentHampton@Ferrellgas.com>;*Patrick Knapp <*pknapp@bridgergroup.com>;*Angell, Cynthia <cangell@akingump.com>;Gamboa, Jeremy;Soifer, Todd;*Hampton, Trent;*Knapp, Patrick	Re: Jamex/Bridger--Revised Draft of PSA	Confidential email communication providing legal advice regarding Jamex/Bridger- revised draft of purchase agreement.
42653	0	2/4/2016 6:24 AM	*Lehman, Andy <alehman@AKINGUMP.com>	Julio Rios <jrios@bridgergroup.com>	<jgamboa@bridgergroup.com>;Todd Soifer <toddssoifer@ferrellgas.com>;*Hampton, Trent <TrentHampton@Ferrellgas.com>;*Patrick Knapp <*pknapp@bridgergroup.com>;*Angell, Cynthia <cangell@akingump.com>	Re: Jamex/Bridger--Revised Draft of PSA	Confidential email communication providing legal advice regarding Jamex/Bridger- revised draft of purchase agreement.
42665	0	2/4/2016 12:24 PM	*Lehman, Andy </O=AKINGUMP/OU=EXCHANGE ADMINISTRATIVE GROUP (FYDIBOHF23SPDLT)/CN=RECIPIE NTS/CN=ALEHMAN>	Julio Rios <jrios@bridgergroup.com>	*Angell, Cynthia <cangell@akingump.com>;*Hampton, Trent <TrentHampton@Ferrellgas.com>;Jeremy Gamboa <jgamboa@bridgergroup.com>;*Patrick Knapp <*pknapp@bridgergroup.com>;Todd Soifer <ToddSoifer@ferrellgas.com>	Re: Jamex/Bridger--Revised Draft of PSA	Confidential email communication providing legal advice regarding Jamex / Bridger revised draft of purchase agreement.
42667	0	2/4/2016 12:28 PM	Julio Rios <jrios@bridgergroup.com>;Julio Rios <jrios@bridgergroup.com>	*Lehman, Andy <alehman@AKINGUMP.com>;*Lehman, Andy <alehman@akingump.com>	Jeremy Gamboa <jgamboa@bridgergroup.com>;Todd Soifer <toddssoifer@ferrellgas.com>;*Hampton, Trent <TrentHampton@Ferrellgas.com>;*Patrick Knapp <*pknapp@bridgergroup.com>;*Angell, Cynthia <cangell@akingump.com>;*Angell, Cynthia <cangell@akingump.com>;*Hampton, Trent <TrentHampton@Ferrellgas.com>;Jeremy Gamboa <jgamboa@bridgergroup.com>;*Patrick Knapp <*pknapp@bridgergroup.com>;Todd Soifer <ToddSoifer@ferrellgas.com>	Re: Jamex/Bridger--Revised Draft of PSA	Confidential email communication discussing legal advice regarding Jamex/Bridger- revised draft of purchase agreement.

42666	0	2/4/2016 12:28 PM	Julio Rios <jrios@bridgergroup.com>	*Lehman, Andy <alehman@akingump.com>	*Angell, Cynthia <cangell@akingump.com>;*Hampton, Trent <TrentHampton@Ferrellgas.com>;Jeremy Gamboa <jgamboa@bridgergroup.com>;*Patrick Knapp <*pknapp@bridgergroup.com>;Todd Soiefer <ToddSoiefer@ferrellgas.com>	Re: Jamex/Bridger--Revised Draft of PSA	Confidential email communication discussing legal advice regarding Jamex / Bridger revised draft of purchase agreement.
43753	0	2/12/2016 6:56 PM	*Lehman, Andy <alehman@akingump.com> </O=AKINGUMP/OU=EXCHANGE ADMINISTRATIVE GROUP (FYDIBOHF23SPDLT)/CN=RECIPIENTS/CN=ALEHMAN>	*Hampton, Trent <TrentHampton@Ferrellgas.com>;*Patrick Knapp <*pknapp@bridgergroup.com>	*Angell, Cynthia <cangell@akingump.com>	RE: BTS	Confidential email communication providing legal advice regarding Bridger Transfer Services sale.
44907	0	2/25/2016 12:07 PM	*Hampton, Trent <TrentHampton@Ferrellgas.com>	Goodgame John <JGoodgame@AkinGump.com>		BTS	Confidential email communication providing legal advice regarding Bridger Transfer Services sale.
44908	0	2/25/2016 12:17 PM	*Goodgame, John <JGoodgame@AkinGump.com>	*Hampton, Trent <TrentHampton@Ferrellgas.com>;*Hampton, Trent		Re: BTS	Confidential email communication providing legal advice regarding inquiry from reporter about Bridger deal.
44909	0	2/25/2016 12:20 PM	*Hampton, Trent	*Goodgame, John <JGoodgame@AkinGump.com>		Re: BTS	Confidential email communication providing legal advice regarding Reuters inquiry into Bridger Transfer Services sale.
44916	0	2/25/2016 2:17 PM	*Hampton, Trent	*Goodgame, John <JGoodgame@AkinGump.com>		RE: BTS	Confidential email communication providing legal advice regarding Reuters inquiry into Bridger Transfer Services sale.
44917	0	2/25/2016 2:20 PM	*Goodgame, John <JGoodgame@AkinGump.com>	*Hampton, Trent <TrentHampton@Ferrellgas.com>;*Hampton, Trent		Re: BTS	Confidential email communication providing legal advice regarding inquiry from reporter about Bridger deal.
44919	0	2/25/2016 2:36 PM	*Hampton, Trent	*Goodgame, John <JGoodgame@AkinGump.com>		RE: BTS	Confidential email communication providing legal advice regarding Reuters inquiry into Bridger Transfer Services sale.
44954	0	2/25/2016 6:13 PM	*Goodgame, John <O=AKINGUMP/OU=HO/CN=RECIPENTS/CN=JGOODGAME>	*Lehman, Andy <alehman@akingump.com>		Fwd: BTS	Confidential email communication providing legal advice regarding post-closing documentation Bridger Logistics sale to Ferrellgas.
44955	0	2/25/2016 6:13 PM	*Goodgame, John <O=AKINGUMP/OU=HO/CN=RECIPENTS/CN=JGOODGAME>	*Lehman, Andy <alehman@akingump.com>		Fwd: BTS	Confidential email communication providing legal advice regarding post-closing documentation Bridger Logistics sale to Ferrellgas.
45769	1	3/17/2016 1:54 PM	*Smith, Luke <Luke.Smith@bracewelllaw.com>	*Hampton, Trent <TrentHampton@Ferrellgas.com>;*Hampton, Trent	Brunette, Jeris <Jeris.Brunette@bracewelllaw.com>;Heitmann, Al <alheitmann@Ferrellgas.com>;Heitmann, Al	RE: Debt Matters & BTS Subsidiary Sale	Attorney-client privileged communication/document providing and/or discussing legal advice
45783	0	3/18/2016 8:16 AM	Heitmann, Al	*Smith, Luke <Luke.Smith@bracewelllaw.com>;*Hampton, Trent	Brunette, Jeris <Jeris.Brunette@bracewelllaw.com>	RE: Debt Matters & BTS Subsidiary Sale	Attorney-client privileged communication/document providing and/or discussing legal advice
45784	0	3/18/2016 8:16 AM	Heitmann, Al <alheitmann@Ferrellgas.com>	*Smith, Luke <Luke.Smith@bracewelllaw.com>;*Hampton, Trent <TrentHampton@Ferrellgas.com>;*Hampton, Trent	Brunette, Jeris <Jeris.Brunette@bracewelllaw.com>	RE: Debt Matters & BTS Subsidiary Sale	Attorney-client privileged communication/document providing and/or discussing legal advice
45791	2	3/18/2016 2:13 PM	*Smith, Luke <Luke.Smith@bracewelllaw.com>	*Hampton, Trent <TrentHampton@Ferrellgas.com>;*Hampton, Trent	Brunette, Jeris <Jeris.Brunette@bracewelllaw.com>;Heitmann, Al <alheitmann@Ferrellgas.com>;Heitmann, Al	RE: Debt Matters & BTS Subsidiary Sale	Attorney-client privileged communication/document providing and/or discussing legal advice

45794	0	3/18/2016 2:17 PM	*Hampton, Trent <TrentHampton@Ferrellgas.com>	*Smith, Luke <Luke.Smith@bracewelllaw.com>	Brunette, Jeris <Jeris.Brunette@bracewelllaw.com>;Heitmann, Al <alheitmann@Ferrellgas.com>;Heitmann, Al	RE: Debt Matters & BTS Subsidiary Sale	Attorney-client privileged communication/document providing and/or discussing legal advice
45795	0	3/18/2016 2:17 PM	*Hampton, Trent	*Smith, Luke <Luke.Smith@bracewelllaw.com>	Brunette, Jeris <Jeris.Brunette@bracewelllaw.com>;Heitmann, Al <alheitmann@Ferrellgas.com>;Heitmann, Al	RE: Debt Matters & BTS Subsidiary Sale	Attorney-client privileged communication/document providing and/or discussing legal advice
45796	0	3/18/2016 2:19 PM	Heitmann, Al	*Hampton, Trent		Re: Debt Matters & BTS Subsidiary Sale	Attorney-client privileged communication/document providing and/or discussing legal advice
45797	0	3/18/2016 2:19 PM	Heitmann, Al <alheitmann@Ferrellgas.com>	*Hampton, Trent <TrentHampton@Ferrellgas.com>;*Hampton, Trent		Re: Debt Matters & BTS Subsidiary Sale	Attorney-client privileged communication/document providing and/or discussing legal advice
46042	2	3/24/2016 8:52 AM	*Smith, Luke <Luke.Smith@bracewelllaw.com>	*Hampton, Trent <TrentHampton@Ferrellgas.com>;*Hampton, Trent	Brunette, Jeris <Jeris.Brunette@bracewelllaw.com>;Heitmann, Al <alheitmann@Ferrellgas.com>;Heitmann, Al	RE: Debt Matters & BTS Subsidiary Sale	Attorney-client privileged communication/document providing and/or discussing legal advice
46122	2	3/28/2016 9:15 AM	*Smith, Luke <Luke.Smith@bracewelllaw.com>	*Hampton, Trent <TrentHampton@Ferrellgas.com>;*Hampton, Trent		RE: Debt Matters & BTS Subsidiary Sale	Attorney-client privileged communication/document providing and/or discussing legal advice
46252	2	3/30/2016 8:42 AM	*Smith, Luke <Luke.Smith@bracewelllaw.com>	*Hampton, Trent <TrentHampton@Ferrellgas.com>;*Hampton, Trent		RE: Debt Matters & BTS Subsidiary Sale	Attorney-client privileged communication/document providing and/or discussing legal advice

Exhibit B

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September 27, 2019

VIA EMAIL (jake.kramer@bclplaw.com)

Jacob A. Kramer
Bryan Cave Leighton Paisner LLP
1155 F Street, N.W.
Washington, DC 20004-1357

Re: *Eddystone Rail Company, LLC v. Bridger Logistics, LLC et al.* - FGP's Production of Crime-Fraud Documents

Dear Jake:

Now that the Court of Appeals has denied the petition for mandamus, we are writing to address the documents that Defendants Bridger Logistics, LLC, Ferrellgas L.P., and Ferrellgas Partners, L.P. (together "FGP") are required to produce in response to Judge Kelly's June 28, 2019 crime-fraud order (the "June 28 Order"). We trust that this letter will facilitate and expedite production.

On June 5, Judge Kelly ordered production in chambers of over 800 documents as a sampling of documents that fell within the scope of Eddystone's motion to compel. He "carefully analyzed every document submitted by" FGP and found that approximately 134 directly evidenced fraudulent transfers. Response to Petition for Writ of Mandamus by the Honorable Robert F. Kelly ("Petition Response") at 2. On the basis of prior arguments and briefing and that *in camera* review, Judge Kelly entered the June 28 Order compelling production of the documents Eddystone seeks. *Id.*

The June 28 Order requires FGP to produce "all documents requested by Eddystone," including documents addressing "the restructuring of BTS, the transferring or redirecting of BTS' assets and/or revenue streams, the sale of BTS to Jamex, and the cessation of the Monroe shipping arrangement." June 28 Order at 13. The June 28 Order also notes that the "vast majority" of the 850 documents that Judge Kelly examined as part of his *in-camera* review were subject to the crime-fraud exception, and therefore should be produced. *Id.*

Plainly, the June 28 Order encompasses the documents produced to Judge Kelly and thousands of other documents on FGP's privilege log. Obviously, the "sampling" produced to

Jacob A. Kramer
September 27, 2019
Page 2

Judge Kelly falls within the scope of the June 28 Order and must be immediately produced. They are already segregated and ready for production, as they have been produced to Chambers. Please tell us how you will produce those electronically to us. We expect this to be accomplished no later than Monday, September 30.

In addition, we have attached a chart we prepared that contains excerpts from the log identifying documents that fall within the scope of the Order. The excerpts cover the period April 1, 2015 – May 31, 2016 (the “Subject Timeframe”). We prepared the chart based on the descriptions of the documents in FGP’s log, which indicate that they fall within the scope of the Judge’s order. We expect production of these documents no later than October 11. If you believe that any of these documents are not within the scope of the June 28 Order, we expect an updated privilege log by October 11 so that we can assess your position and determine whether further motions practice is necessary.

Of course, there could be many other documents that FGP is obligated to produce, but FGP’s privilege log does not provide sufficient information for us to make a determination. As to these documents, we expect production of a more detailed privilege log that gives us a basis for understanding your reasons for withholding them notwithstanding the June 28 Order. Please advise as to your expected time frame for completing this review.

Finally, we ask that when making its production, FGP include in the metadata for each document the “Priv Log ID” number. FGP used this number to identify documents on its privilege log. Absent production of this number, we will have difficulty determining which entries in the log correspond to particular produced documents.

If you have any questions or comments regarding the foregoing, please feel free to contact me.

Regards,

Steve J. Barber/mk

Steve J. Barber

cc: Jon Kelly (via email)
Jeremy Fielding (via email)
Kent Krabill (via email)

Exhibit C

October 1, 2019



Jacob A. Kramer
Direct: 202/508-6153
Fax: 202/220-7453
jake.kramer@bclplaw.com

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Steve Barber
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1330 Connecticut Avenue NW
Washington, DC 20036

VIA E-MAIL (SBARBER@STEPTOE.COM)

Re: Eddystone Rail Company, LLC v. Bridger Logistics, LLC et al.
Crime-Fraud Order

Dear Steve:

We write to respond to your September 27 letter concerning Judge Kelly's June 28, 2019 order (the "June 28 Order").

As an initial matter, the June 28 Order provides that the "BL/FG Defendants shall produce their documents to Eddystone starting within three weeks of the date of this Order," and it further provides that "in the event the BL/FG Defendants file an appeal, their production shall be **STAYED** pending a decision of the Appellate Court." Thus, the Court stayed its June 28 Order pending appeal, the Third Circuit denied the BL/FG Defendants' petition for a writ of mandamus on September 27, and the period to *begin* producing documents expires three weeks later on October 18 (barring any further appellate proceedings). Consequently, it is unreasonable to demand an initial production on September 30 (one business day after the Third Circuit issued its order) and to demand that we complete the production by October 11.

We also do not understand the demand to produce the entire sample of documents reviewed *in camera* by Judge Kelly. As your letter acknowledges, Judge Kelly reviewed more than 800 documents. Yet he stated in his September 20 response to the mandamus petition that "there are approximately 134 *in camera* review documents that I have found to provide a reasonable basis to suspect" that the crime-fraud exception applies. Along similar lines, Judge Kelly stated in his June 28 Memorandum Opinion that "the vast majority of the emails submitted for *in camera* review pertain to the furtherance of allegedly fraudulent transfers." Both statements make clear that Judge Kelly did not find that *all* of the documents submitted for *in camera* review are subject to the crime-fraud exception.

Rather, the June 28 Order provides that "the crime-fraud exception applies to extinguish the attorney-client privilege and work product privilege as to communications between BL/FG Defendants and their in-house and outside attorneys regarding the following subject matter areas: the restructuring of BTS; the transferring or redirecting of BTS' assets or/and revenue

streams; the sale of BTS to Jamex; and the cessation of the Monroe shipping arrangement.” Some of the documents in the *in camera* review sample do not fall within these categories.

We intend to produce documents listed on our privilege log during the Relevant Period (as defined below) that fall into the categories identified in the June 28 Order. Although we are not required to begin our production until October 18, we plan to produce the first batch of documents (from the *in camera* review sample) this week, and we expect to complete the entire production before October 18. We also are able to include the “Priv Log ID” numbers in the metadata, as you request.

With respect to the scope of our production, however, we do not agree that “April 1, 2015 – May 31, 2016” is the “Subject Timeframe.” Eddystone’s motion to compel under the crime-fraud exception focused exclusively on the two time periods from (1) May to July 2015 and (2) December 2015 to February 2016 (the “Relevant Period”), and the BL/FG Defendants responded accordingly in opposing the motion. Indeed, Eddystone’s reply brief (at 27) describes these as “*the time periods Eddystone identified as relevant* to its fraudulent transfer claims,” and the Court’s June 28 Memorandum Opinion (at 13) compels “disclosure of all documents *requested by Eddystone.*” (emphasis added). You cannot unilaterally expand the scope of the motion and the June 28 Order.

Moreover, there is no basis to extend the Relevant Period as you suggest, because the two sets of allegedly fraudulent transfers concluded by July 2015 and February 2016, respectively. It is clear that the crime-fraud exception does not apply to privileged communications exchanged *after* an alleged fraud. *Haines v. Liggett Grp. Inc.*, 975 F.2d 81, 90 (3d Cir. 1992) (the “seal is broken” only “when the lawyer’s communication is meant to facilitate future wrongdoing by the client,” *i.e.*, giving “advice that is illicit because it gives direction for the commission of future fraud or crime”); *see also United States v. Zolin*, 491 U.S. 554, 562-63 (1989) (confining crime-fraud exception to advice furthering “future wrongdoing”).

Accordingly, while we are prepared to produce responsive documents from the Relevant Period, the June 28 Order does not require the production of any privileged communications that fall outside of the Relevant Period. It is our duty and responsibility to zealously protect the confidentiality of our client’s privileged communications, and we cannot simply turn over documents that fall outside of the scope of Eddystone’s motion and the resulting June 28 Order.

We also do not intend to comply with your request to provide yet another version of our privilege log, as we have already revised the log to provide more fulsome descriptions during the Relevant Period and beyond, from (1) September 2014 to July 2015 and (2) December 2015 to February 2016. As you may recall, we agreed in November 2018 to a compromise you proposed to resolve this very issue, and on December 19, 2018 we served our Third Revised Privilege Log with more detailed descriptions for the period from September 1, 2014 through April 30, 2015. We therefore do not understand the request for yet another privilege log with additional descriptions that fall outside the compromise period you proposed.

Finally, as you are aware, the remaining deponents on Eddystone’s list are no longer employed by the BL/FG Defendants, and scheduling the depositions is likely to be a challenge

October 1, 2019
Page 3

BRYAN
CAVE
LEIGHTON
PAISNER 

for us all. As a result, we would appreciate a dialogue regarding the period of time in which such depositions will occur.

The documents at issue from the Relevant Period can be produced in a relatively short time period. If we cannot agree on the scope of the June 28 Order, however, we may require clarification from the Court.

Please let us know if you'd like to discuss any of the foregoing.

Regards,



Jacob A. Kramer

cc: All Counsel of Record

Exhibit D

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October 2, 2019

VIA EMAIL (jake.kramer@bclplaw.com)

Jacob A. Kramer
Bryan Cave Leighton Paisner LLP
1155 F Street, N.W.
Washington, DC 20004-1357

Re: *Eddystone Rail Company, LLC v. Bridger Logistics, LLC et al.* - FGP's Production of Crime-Fraud Documents

Dear Jake:

We write to respond to your October 1 letter regarding Judge Kelly's June 28, 2019 order ("June 28 Order"). Eddystone rejects FGP's efforts to unilaterally limit the scope of the June 28 Order and reiterates its demand for all documents identified in my September 27 letter.

The June 28 Order requires FGP to produce "all documents requested by Eddystone," including documents addressing "the restructuring of BTS, the transferring or redirecting of BTS' assets and/or revenue streams, the sale of BTS to Jamex, and the cessation of the Monroe shipping arrangement." June 28 Memorandum at 13; *see also* June 28 Order at 2 (Doc. 333). You suggest that some of the documents submitted for *in camera* review fall outside the scope of the order. But the Court's June 5 order required FGP to produce a sampling of documents that was "judiciously crafted after thoroughly understanding the issues in this action and the arguments made by the parties." Sept. 19 Response by the Hon. Robert F. Kelly, at 2. The Court entered its June 28 Order after "carefully analyz[ing] every document submitted by" FGP, and finding that the attorney-client privilege and work product privilege were extinguished as to the foregoing categories of documents. *See id.* Because the *in camera* production was a sample of the documents falling within those categories, all documents submitted *in camera* necessarily fall within the scope of the June 28 Order. Indeed, the *in camera* documents are now part of the record in this case and can be released by the Court. *See* June 28 Order at 2 (explaining that the Court "will retain the documents for *in camera* review under seal in chambers *until* such time [that the Appellate Court has acted]"') (emphasis added).

Jacob A. Kramer
 October 2, 2019
 Page 2

The June 28 Order is not limited by time period. Yet, FGP now attempts to unilaterally limit its production to documents generated from May to July 2015 and from December 2015 to February 2016. FGP claims that Eddystone's crime-fraud motion was limited to these periods but its only citation for that proposition is page 27 of Eddystone's reply brief. That page addressed the *privilege log entries* that FGP was required to revise, not the documents FGP was required to produce. In its crime-fraud motion,¹ Eddystone repeatedly stated that the fraudulent transfers occurred during the entire period from June 2015 to February 2016. *See, e.g.*, Motion at 17 ("Defendants engaged in carefully planned and implemented intentional fraudulent transfers of substantially all of BTS's assets between June 2015 and February 2016.") Eddystone did not know when FGP began to plan the fraudulent transfers and how long the cover up continued, because FGP claimed privilege over the documents that would have revealed that information. Accordingly, Eddystone placed no time limits on its requests for crime-fraud documents. In an effort to aid FGP's production efforts, the September 27 letter included a chart of responsive documents spanning the period April 2015 to May 31, 2016. But as noted in the letter, FGP's production obligations are not limited to the documents on the chart. FGP is required to produce these and any other documents that address "the restructuring of BTS, the transferring or redirecting of BTS' assets and/or revenue streams, the sale of BTS to Jamex, and the cessation of the Monroe shipping arrangement." And our September 27 letter gives you the specific Bates numbers of the documents which require either production or more detailed descriptions in FGP's logs.

Your letter suggests that there is no reason to produce documents after July 2015 and after February 16, 2016 because "the crime-fraud exception does not apply to privileged communications exchanged *after* an alleged fraud." Here, however, the fraud was ongoing. More importantly, the Court's order does not recognize a temporal limitation. It found that the crime-fraud exception applies to extinguish the privileges regarding the listed subject matter areas. *See* June 28 Order at 2.

You suggest that the June 28 Order allows FGP to wait until October 18 to *begin* production. But under the order, FGP was granted three weeks after the June 28 Order either to file a brief seeking appellate relief or to commence production. FGP chose to seek appellate relief and did so in three weeks. The Court's order does not give FGP a second period of three weeks in which to produce the documents. Moreover, as discussed in the September 27 letter, there is simply no reason to delay production of the *in camera* documents. They have been assembled and produced to Judge Kelly—in both electronic and hard copies—and could be produced to Eddystone at the touch of a button. Nor is there any reason to delay production of the remaining documents, which we have specifically identified, beyond October 11.

Eddystone moved to compel on October 12, 2018 and has been awaiting production for nearly a year. Thousands of pages have been written on the merits and we now have final decisions. FGP must now produce. The district court's June 28 Order does not impose the

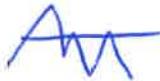
¹ Plaintiff Eddystone Rail Company's Motion to Compel Production of Withheld Documents Under the Crime-Fraud Exception ("Motion").

Jacob A. Kramer
October 2, 2019
Page 3

limitations that you seek to inject, and we reject your efforts to relitigate what has already been decided by the district court.

Please let us know by noon on October 4 whether FGP will reconsider its position. If FGP will not agree to the demands in our September 27 letter, Eddystone will seek relief from the Court.

Regards,



Steve J. Barber

cc: Jon Kelly (via email)
Jeremy Fielding (via email)
Kent Krabill (via email)

Exhibit E

From: [Kramer, Jake](#)
To: [Barber, Steve](#)
Cc: [Michael Witsch](#); [Kent Krabill](#); [Christian Orozco](#); [Greg Brassfield](#); [Eddystone-Steptoe-EDPA](#); [Henry Hank E. Hockheimer Jr.](#); [grugrant@ballardspahr.com](#); [jnegovan@qriesinglaw.com](#); [Richard L. Scheff](#); [Eddystone Team](#); [Fielding, Jeremy Alan](#) ([jeremy.fielding@kirkland.com](#)); [Kelley, Jon David](#) ([jon.kelley@kirkland.com](#)) ([jon.kelley@kirkland.com](#))
Subject: RE: Crime-Fraud Production
Date: Thursday, October 3, 2019 6:55:57 PM

Steve:

Thanks for your letter. To be perfectly clear, we have every intention of complying with the Court's June 28 Order. You have already received our initial production, which includes the responsive documents from the *in camera* review sample. By October 11, we intend to produce all responsive documents from the Relevant Period. We did not understand your motion or the Court's order to encompass communications outside of that period and therefore will need a bit more time to determine whether any additional responsive documents exist, beginning with the documents identified in your chart. Frankly, we do not think there are responsive communications outside of the Relevant Period. If there is more to produce, we will aim to have the documents to you by October 18.

Regards,
Jake



JACOB A. KRAMER
Partner
[BRYAN CAVE LEIGHTON PAISNER LLP](#) - Washington, D.C. USA
jacob.kramer@bclplaw.com
T: +1 202 508 6153 M: +1 202 550 8547

From: Barber, Steve [mailto:SBarber@steptoe.com]
Sent: Wednesday, October 02, 2019 5:11 PM
To: Kramer, Jake
Cc: Michael Witsch; Kent Krabill; Christian Orozco; Greg Brassfield; Eddystone-Steptoe-EDPA; Henry Hank E. Hockheimer Jr.; grugant@ballardspahr.com; jnegovan@griesinglaw.com; Richard L. Scheff; Eddystone Team; Fielding, Jeremy Alan (jeremy.fielding@kirkland.com); Kelley, Jon David <jon.kelley@kirkland.com> (jon.kelley@kirkland.com)
Subject: RE: Crime-Fraud Production

Jake: Attached is our response to your October 1 letter. Thanks. S.

Steven J. Barber
Partner
SBarber@steptoe.com

Steptoe

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From: Kramer, Jake <jake.kramer@bclplaw.com>
Sent: Tuesday, October 1, 2019 4:44 PM

To: Barber, Steve <SBarber@steptoe.com>
Cc: Michael Witsch <MWitsch@ArmstrongTeasdale.com>; Kent Krabill <kkrabill@lynnlp.com>; Christian Orozco <corozco@lynnlp.com>; Greg Brassfield <gbrassfield@lynnlp.com>; Eddystone-Steptoe-EDPA <Eddystone-Steptoe-EDPA@Steptoe.com>; Henry Hank E. Hockheimer Jr. <hockheimerh@ballardspahr.com>; grugant@ballardspahr.com; jnegovan@griesinglaw.com; Richard L. Scheff <RLScheff@ArmstrongTeasdale.com>; Eddystone Team <EddystoneTeam@bryancave.com>; Fielding, Jeremy Alan (jeremy.fielding@kirkland.com) <jeremy.fielding@kirkland.com>; Kelley, Jon David <jon.kelley@kirkland.com> (jon.kelley@kirkland.com) <jon.kelley@kirkland.com>
Subject: RE: Crime-Fraud Production

Steve:

Attached is a response to your letter.

Regards,
Jake



JACOB A. KRAMER
Partner
BRYAN CAVE LEIGHTON PAISNER LLP - Washington, D.C. USA
jacob.kramer@bclplaw.com
T: +1 202 508 6153 M: +1 202 550 8547

From: Barber, Steve [mailto:SBarber@steptoe.com]
Sent: Friday, September 27, 2019 4:16 PM
To: Kramer, Jake
Cc: Michael Witsch; Jeremy Fielding; Kent Krabill; Jon Kelley; Christian Orozco; Greg Brassfield; Eddystone-Steptoe-EDPA; Henry Hank E. Hockheimer Jr.; grugant@ballardspahr.com; jnegovan@griesinglaw.com; Richard L. Scheff; Eddystone Team
Subject: Crime-Fraud Production

Jake –

Attached please find a letter regarding the Court's crime-fraud order.

Regards,

S.

Steven J. Barber
Partner
SBarber@steptoe.com

Steptoe

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Exhibit F

From: [Kramer, Jake](#)
To: [Barber, Steve](#)
Cc: [Michael Witsch](#); [Kent Krabill](#); [Christian Orozco](#); [Greg Brassfield](#); [Eddystone-Steptoe-EDPA](#); [Henry Hank E. Hockheimer Jr.](#); [grugant@ballardspahr.com](#); [jnegovian@griesinglaw.com](#); [Richard L. Scheff](#); [Eddystone Team](#); [Fielding, Jeremy Alan](#); [\(jeremy.fielding@kirkland.com\)](#); [Kelley, Jon David](#) <jon.kelley@kirkland.com> (jon.kelley@kirkland.com)
Subject: RE: Crime-Fraud Production
Date: Monday, October 7, 2019 3:49:02 PM

Steve:

We are assessing our ability to update our privilege log as you request, as well as the corresponding burden. We will be back to you about this later in the week.

Thanks,
Jake



JACOB A. KRAMER
Partner
BRYAN CAVE LEIGHTON PAISNER LLP - Washington, D.C. USA
jacob.kramer@bclplaw.com
T: +1 202 508 6153 M: +1 202 550 8547

From: Barber, Steve [mailto:SBarber@steptoe.com]
Sent: Friday, October 04, 2019 1:32 PM
To: Kramer, Jake
Cc: Michael Witsch; Kent Krabill; Christian Orozco; Greg Brassfield; Eddystone-Steptoe-EDPA; Henry Hank E. Hockheimer Jr.; grugant@ballardspahr.com; jnegovan@griesinglaw.com; Richard L. Scheff; Eddystone Team; Fielding, Jeremy Alan (jeremy.fielding@kirkland.com); Kelley, Jon David <jon.kelley@kirkland.com> (jon.kelley@kirkland.com)
Subject: RE: Crime-Fraud Production

Jake: As we understand it, FGP is also refusing to provide an amended privilege log specifying why particular *in camera* documents and documents identified on the chart to the September 27 letter are allegedly not within the scope of the June 28 Order. Is that correct? S.

Steven J. Barber
Partner
SBarber@steptoe.com

Steptoe

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From: Kramer, Jake <jake.kramer@bclplaw.com>
Sent: Friday, October 4, 2019 11:41 AM

To: Barber, Steve <SBarber@steptoe.com>
Cc: Michael Witsch <MWitsch@ArmstrongTeasdale.com>; Kent Krabill <kkrabill@lynnlp.com>; Christian Orozco <corozco@lynnlp.com>; Greg Brassfield <gbrassfield@lynnlp.com>; Eddystone-Steptoe-EDPA <Eddystone-Steptoe-EDPA@Steptoe.com>; Henry Hank E. Hockheimer Jr. <hockheimerh@ballardspahr.com>; grugant@ballardspahr.com; jnegovan@griesinglaw.com; Richard L. Scheff <RLScheff@ArmstrongTeasdale.com>; Eddystone Team <EddystoneTeam@bryancave.com>; Fielding, Jeremy Alan (jeremy.fielding@kirkland.com) <jeremy.fielding@kirkland.com>; Kelley, Jon David <jon.kelley@kirkland.com> (jon.kelley@kirkland.com) <jon.kelley@kirkland.com>
Subject: RE: Crime-Fraud Production

Steve:

We produced the documents from the in camera sample that fall within the categories listed in the June 28 Order. The production includes the vast majority of the sample documents, but not all of them.



JACOB A. KRAMER
Partner
BRYAN CAVE LEIGHTON PAISNER LLP - Washington, D.C. USA
jacob.kramer@bclplaw.com
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From: Barber, Steve [<mailto:SBarber@steptoe.com>]
Sent: Friday, October 04, 2019 6:45 AM
To: Kramer, Jake
Cc: Michael Witsch; Kent Krabill; Christian Orozco; Greg Brassfield; Eddystone-Steptoe-EDPA; Henry Hank E. Hockheimer Jr.; grugrant@ballardspahr.com; jnegovan@griesinglaw.com; Richard L. Scheff; Eddystone Team; Fielding, Jeremy Alan (jeremy.fielding@kirkland.com); Kelley, Jon David <jon.kelley@kirkland.com> (jon.kelley@kirkland.com)
Subject: RE: Crime-Fraud Production

Jake: Have you now produced all documents that were provided to the Court *in camera* or only the ones you deem “responsive”? As noted in my letters of September 27 and October 2, all *in camera* documents should be produced. As further discussed in my letters, we will also need more detailed privilege logs. Thanks. S.

Steven J. Barber
Partner
SBarber@steptoe.com

Steptoe

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From: Kramer, Jake <jake.kramer@bclplaw.com>

Sent: Thursday, October 3, 2019 6:56 PM

To: Barber, Steve <SBarber@steptoe.com>

Cc: Michael Witsch <MWitsch@ArmstrongTeasdale.com>; Kent Krabill <kkrabill@lynllp.com>; Christian Orozco <corozco@lynllp.com>; Greg Brassfield <gbrassfield@lynllp.com>; Eddystone-Steptoe-EDPA <Eddystone-Steptoe-EDPA@Steptoe.com>; Henry Hank E. Hockeimer Jr. <hockeimerh@ballardspahr.com>; grugant@ballardspahr.com; inegovan@griesinglaw.com; Richard L. Scheff <RLScheff@ArmstrongTeasdale.com>; Eddystone Team <EddystoneTeam@bryancave.com>; Fielding, Jeremy Alan (jeremy.fielding@kirkland.com) <jeremy.fielding@kirkland.com>; Kelley, Jon David <jon.kelley@kirkland.com> (jon.kelley@kirkland.com) <jon.kelley@kirkland.com>

Subject: RE: Crime-Fraud Production

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Thanks for your letter. To be perfectly clear, we have every intention of complying with the Court's June 28 Order. You have already received our initial production, which includes the responsive documents from the *in camera* review sample. By October 11, we intend to produce all responsive documents from the Relevant Period. We did not understand your motion or the Court's order to encompass communications outside of that period and therefore will need a bit more time to determine whether any additional responsive documents exist, beginning with the documents identified in your chart. Frankly, we do not think there are responsive communications outside of the Relevant Period. If there is more to produce, we will aim to have the documents to you by October 18.

Regards,
Jake



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From: Barber, Steve [<mailto:SBarber@steptoe.com>]

Sent: Wednesday, October 02, 2019 5:11 PM

To: Kramer, Jake

Cc: Michael Witsch; Kent Krabill; Christian Orozco; Greg Brassfield; Eddystone-Steptoe-EDPA; Henry Hank E. Hockeimer Jr.; grugant@ballardspahr.com; inegovan@griesinglaw.com; Richard L. Scheff; Eddystone Team; Fielding, Jeremy Alan (jeremy.fielding@kirkland.com); Kelley, Jon David <jon.kelley@kirkland.com> (jon.kelley@kirkland.com)

Subject: RE: Crime-Fraud Production

Jake: Attached is our response to your October 1 letter. Thanks. S.

Steven J. Barber

Partner

SBarber@steptoe.com

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From: Kramer, Jake <jake.kramer@bclplaw.com>
Sent: Tuesday, October 1, 2019 4:44 PM
To: Barber, Steve <SBarber@steptoe.com>
Cc: Michael Witsch <MWitsch@ArmstrongTeasdale.com>; Kent Krabill <kkrabill@lynllp.com>; Christian Orozco <corozco@lynllp.com>; Greg Brassfield <gbrassfield@lynllp.com>; Eddystone-Steptoe-EDPA <Eddystone-Steptoe-EDPA@Steptoe.com>; Henry Hank E. Hockeimer Jr. <hockeimerh@ballardspahr.com>; grugant@ballardspahr.com; jnegovan@griesinglaw.com; Richard L. Scheff <RLScheff@ArmstrongTeasdale.com>; Eddystone Team <EddystoneTeam@bryancave.com>; Fielding, Jeremy Alan (jeremy.fielding@kirkland.com)
<jeremy.fielding@kirkland.com>; Kelley, Jon David <jon.kelley@kirkland.com> (jon.kelley@kirkland.com)
<jon.kelley@kirkland.com>
Subject: RE: Crime-Fraud Production

Steve:

Attached is a response to your letter.

Regards,
Jake



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Partner
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jacob.kramer@bclplaw.com
T: +1 202 508 6153 M: +1 202 550 8547

From: Barber, Steve [mailto:SBarber@steptoe.com]
Sent: Friday, September 27, 2019 4:16 PM
To: Kramer, Jake
Cc: Michael Witsch; Jeremy Fielding; Kent Krabill; Jon Kelley; Christian Orozco; Greg Brassfield; Eddystone-Steptoe-EDPA; Henry Hank E. Hockeimer Jr.; grugant@ballardspahr.com; jnegovan@griesinglaw.com; Richard L. Scheff; Eddystone Team
Subject: Crime-Fraud Production

Jake –

Attached please find a letter regarding the Court's crime-fraud order.

Regards,

S.

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SBarber@steptoe.com

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